

# **Exhibit Q2**

EASTERN PROFIT CORP LIMITED vs STRATEGIC VISION US, LLC  
French Wallop on 02/12/2019

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 -----x  
4 EASTERN PROFIT CORPORATION LIMITED,  
5 Plaintiff-Counterclaim Defendant,  
6 Case No.  
7 -against- 18-cv-2185 JGK  
8 STRATEGIC VISION US, LLC,  
9 Defendant-Counterclaim Plaintiff,  
10 vs.  
11 GUO WENGUI a/k/a, MILES KWOK,  
12 Counterclaim Defendant.  
13 -----x  
14  
15  
16 VIDEOTAPED DEPOSITION  
17 OF  
18 FRENCH WALLOP  
19 New York, New York  
20 Tuesday, February 12, 2019  
21  
22  
23  
24  
25

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1	THE VIDEOGRAPHER:	Good morning. This	
2		is the beginning of media 1 in the	
3		deposition of French Wallop, in the matter	
4		of Eastern Profit Corporation Limited versus	
5		Strategic Vision US, LLC.	
6		Today's date is February 12, 2019. My	
7		name is Jaysun Loushin, I am the	
8		videographer, and the court reporter is	
9		Roberta Caiola. We are here with Huseby	
10		Global Litigation.	
11		Counsel, please introduce yourself,	
12		after which the court reporter will swear in	
13		the witness. The time on the monitor is	
14		9:58.	
15		MR. GRENDI:	Good morning. I'm Zach
16			Grendi. I'm counsel for Eastern Profit
17			Corporation. My law firm is Zeichner,
18			Ellman & Krause.
19		MR. SCHMIDT:	Joe Schmidt from Phillips
20			Lytle, on behalf of Strategic Vision as well
21			as the witness, French Wallop.
22		MS. TESKE:	Erin Teske with Hodgson
23			Russ, on behalf of third-party defendant
24			Miles Kwok.
25			

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<p style="text-align: right;">Page 10</p> <p>1 four years. And then I was at the Ecole    2 D'Interpretes in Geneva. And then I came back to    3 Georgetown University and got my linguistic's    4 degree in simultaneous interpreting.</p> <p>5 Q. Anything else?</p> <p>6 A. I did -- I didn't finish, but I went to    7 SAIS, The School of Advanced International Study,    8 which is part of Johns Hopkins; so it doesn't    9 count as a degree, sadly.</p> <p>10 Q. What about your work experience, let's    11 just say the last 20 years or so?</p> <p>12 A. Oh, my goodness.</p> <p>13 Q. You don't have to say everything. Just    14 an overview.</p> <p>15 A. Well, I've run two companies, and    16 plus -- and I sold them in 2000. And then in    17 about 2005, I started up my Strategic Vision    18 group.</p> <p>19 Q. In 2005, starting Strategic Vision, is    20 that what you've been doing ever since?</p> <p>21 A. Yes.</p> <p>22 Q. Any other employment that you have or    23 businesses that you're running, other than    24 Strategic Vision?</p> <p>25 A. Yes. I have another company that's</p>	<p style="text-align: right;">Page 12</p> <p>1 Dr. Waller?</p> <p>2 A. I would say in the last year and a    3 half.</p> <p>4 Q. And how did that come about?</p> <p>5 A. We had an -- I had an introduction by    6 Bill Gertz and Lianchao Han regarding this    7 particular client. I'm not sure, by the way, how    8 to refer to this client. We've referred to him    9 as Miles Guo, G-u-o.</p> <p>10 Q. Eastern Profit is fine.</p> <p>11 MR. SCHMIDT: Well, you know, you refer    12 to him however you think the client is.</p> <p>13 A. He has about six names, so I'm not sure    14 what goes into the record.</p> <p>15 Q. Whatever you know.</p> <p>16 A. We refer to him as Miles Guo. But I    17 was referred to him by both Bill Gertz, the    18 Washington Times and the Free Beacon, and    19 Lianchao. And I -- when they approached me,    20 that's when I decided Mike was one of the people    21 I really wanted to work with on this.</p> <p>22 Q. But I wanted to ask you. Have you ever    23 worked with Dr. Waller on any investigatory    24 research before, as you said, you were introduced    25 to Mr. Guo?</p>
<p style="text-align: right;">Page 11</p> <p>1 called Regency Mayfair Worldwide, and that works    2 overseas on projects.</p> <p>3 Q. What kind of projects?</p> <p>4 A. Family office groups.</p> <p>5 Q. What do you mean by that? What kind of    6 projects do you do for family office groups    7 through this Mayfair company?</p> <p>8 A. Investment -- investment advisory.</p> <p>9 Q. Okay. So nothing to do with    10 investigatory research or things of that nature?</p> <p>11 A. No.</p> <p>12 Q. How do you know Michael Waller, or John    13 Michael Waller?</p> <p>14 A. Well, Mike Waller is the way we refer    15 to him, or Dr. Waller. Gosh, I've known Mike for    16 many, many years. I would say, certainly,    17 certainly 20. And our paths have crossed many    18 times in Washington on both international affairs    19 and intelligence groups.</p> <p>20 Q. When did Mr. Waller -- well, I'll call    21 him Dr. Waller.</p> <p>22 A. Yes, he is Dr. Waller.</p> <p>23 Q. He didn't insist on it the last time,    24 but fair enough. When did you start -- or when    25 did Strategic Vision start working with</p>	<p style="text-align: right;">Page 13</p> <p>1 A. No. No.</p> <p>2 Q. Since you were introduced to Mr. Guo,    3 have you and Dr. Waller worked on any other    4 investigatory research together for another    5 client? You don't have to name them.</p> <p>6 A. I can't name them.</p> <p>7 Q. No, I'm saying whether you have or have    8 not provided --</p> <p>9 A. Yes.</p> <p>10 Q. -- a service to another client?</p> <p>11 A. Yes, but -- yes.</p> <p>12 Q. Okay. I didn't ask you to name the    13 client.</p> <p>14 A. Don't worry.</p> <p>15 Q. And how many other clients have you and    16 Dr. Waller worked on investigatory research for?</p> <p>17 A. I can't answer that.</p> <p>18 Q. So you're refusing to answer that    19 question?</p> <p>20 MR. SCHMIDT: No, no, I don't think    21 that's what she's saying.</p> <p>22 MR. GRENDI: Okay.</p> <p>23 Q. How many?</p> <p>24 A. Four.</p> <p>25 MR. SCHMIDT: Approximately? Okay.</p>

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1           THE WITNESS: Approximately, yeah.	1           how to answer it.
2           MR. GRENDI: I'm going to ask that you	2           Q. You don't understand the question?
3           not try to interrupt.	3           A. No, I don't understand the question.
4           MR. SCHMIDT: I'm trying to keep you	4           Q. Okay. What I'm saying is, when did you
5           guys moving forward.	5           stop working with someone else in terms of
6           MR. GRENDI: I appreciate that, but I'm	6           providing investigatory research?
7           not trying to --	7           A. I didn't say I had stopped.
8           MR. SCHMIDT: I think you knew what she	8           Q. So you work with, concurrently, other
9           meant and kind of accused her of refusing to	9           individuals who provide investigatory research
10          answer. I don't think that was appropriate,	10          for Strategic Vision?
11          so that's when I had to step in, okay?	11          A. From time to time.
12          MR. GRENDI: I didn't think that that's	12          Q. Okay. So you don't have an exclusive
13          what I was doing. I was --	13          relationship with Dr. Waller in terms of
14          MR. SCHMIDT: Okay. That's how it was	14          investigatory research that he provides?
15          coming across on the record, so I clarified	15          A. No.
16          it.	16          Q. Okay. You said that you founded
17          MR. GRENDI: Okay. Fair enough.	17          Strategic Vision in 2005?
18          Q. So you and Dr. Waller have worked on	18          A. I think so. I'd have to look.
19          approximately five different investigatory	19          Q. Okay. Was anyone else involved in the
20          research projects with Strategic Vision?	20          company at the time?
21          A. Yes.	21          A. No.
22          Q. And none of them preceded your	22          Q. So it's always been your company?
23          introduction to Mr. Guo?	23          A. Yes.
24          A. No.	24          Q. And you've never had any other
25          Q. No, they did not precede --	25          officers?
Page 15	Page 17
1           A. No.	1           A. No.
2           Q. -- or --	2           Q. Or directors?
3           A. They did not.	3           A. No.
4           Q. Prior to working with Dr. Waller, did	4           Q. Or unit holders?
5          you work with someone else in terms of	5           A. No.
6          investigatory research for Strategic Vision?	6           Q. Have there been any other principals of
7           A. When?	7           Strategic Vision, other than you?
8           Q. Before you started working with	8           A. No.
9          Dr. Waller, so let's say prior to a year and a	9           Q. So what's your role in Strategic
10         half ago.	10         Vision?
11         A. Yes.	11         A. I run certain advisory clients and work
12         Q. And was it just one entity or several	12         with them as clients, private clients.
13         entities?	13         Q. Do you have a title, like CEO?
14         A. I can't remember.	14         A. Yes, I think it's CEO.
15         Q. Without going into any detail. Was	15         Q. So what services does Strategic Vision
16         that a similar arrangement to your arrangement	16         provide to its clients?
17         with Dr. Waller in terms of the provisioning of	17         A. I've already answered that.
18         investigatory research?	18         Q. I don't think you have.
19         A. No.	19         A. I said advisory services.
20         Q. How was it different?	20         Q. What do you mean by advisory services?
21         A. I can't remember.	21         A. Advisory client services.
22         Q. When did you stop working with someone	22         Q. Does that include investigatory
23         else on investigatory research prior to working	23         research?
24         with Dr. Waller?	24         A. Yes, in some cases.
25         A. That's an odd question. I don't know	25         Q. What does that investigatory research

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1 involve? 2 A. Exactly as it says. Each client is 3 different, isn't it? 4 Q. Right. What I'm asking is, what does 5 Strategic Vision's investigatory research 6 services entail? 7 A. Every client is different. 8 Investigatory services is exactly that, depending 9 upon how you want to define investigations. 10 Q. How does Strategic Vision provide that 11 service, what does it do? 12 A. Investigate. 13 Q. How? 14 A. The usual ways. 15 Q. What are the usual ways? 16 A. I find it's a repetitive question. 17 Q. I don't care if you find it a 18 repetitive question. What I'm asking you to do 19 is answer my question. 20 I want to know how Strategic Vision 21 performs investigations? 22 A. We look everybody up on Facebook. 23 Q. That's it? 24 A. Sure. It's an idiotic question. 25 MR. SCHMIDT: Don't comment. Just	1 A. No. 2 Q. Who does? 3 A. Whomever we bring on board to do the 4 investigation. 5 Q. So Strategic Vision hires independent 6 contractors? 7 A. Our own team of people that we have 8 worked with off and on through the years, yes. 9 Q. Do you or Strategic Vision provide any 10 input or edits to any of the reports? I mean, 11 what does Strategic do in terms of -- 12 A. We review the reports. 13 Q. Do you ever edit them? 14 A. I wouldn't say edit them, no. 15 Q. How does Strategic Vision contribute to 16 the end work product of an investigatory research 17 report? 18 A. Well, when we get them, we look at them 19 and we read them, depending upon who the teams 20 are, and discuss them, and then produce them. 21 Sometimes they can be verbal, sometimes they can 22 be on flash drives. It depends what the client 23 needs. 24 Q. Does Strategic Vision -- well, let me 25 ask you this. Strike that.
1 answer the question. 2 Q. Excuse me, ma'am, I'm just trying to 3 understand things. And I think -- maybe you 4 don't understand how a deposition works, but I'm 5 just trying to understand basic information. You 6 might think something is obvious or intuitive, 7 but the record doesn't know that and we don't 8 know that. So I please ask you to cooperate. 9 A. Of course. 10 Q. So other than looking people up on 11 Facebook, how does Strategic Vision perform 12 investigations? 13 A. We do investigative background work on 14 individuals that other clients are interested in 15 pursuing information on. 16 Q. So that background work, does that 17 involve surveillance or electronic research; give 18 me a little detail on what it means to 19 investigate someone for background? 20 A. Precisely. Just as you said. 21 Q. Does Strategic Vision do that 22 investigatory research itself? 23 A. No. 24 Q. So you never perform any research 25 yourself?	1 Do you ever access a network of 2 individuals that you're familiar with to get 3 information for investigatory research? 4 A. Sometimes. 5 Q. And just, without naming any names, 6 describe what that entails? 7 A. Experience. 8 Q. Right. Do you speak to individuals in 9 the intelligence community? 10 A. Yes. 11 Q. Politicians? 12 A. Sometimes. 13 Q. People in the business community? 14 A. Yes. 15 Q. And then you take that information and 16 perhaps include that in an investigatory research 17 report, or how does that work? 18 A. It depends on the client. 19 Q. Give me an example of a client where 20 you did access that network in order to 21 contribute? 22 A. I can't do that precisely. 23 Q. Not with any specificity? 24 A. Just as I said. We are very careful 25 about the investigations that we do, they're

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1 private, and if they are what the client has 2 requested, that's what we do.  3 MR. SCHMIDT: French, maybe you can 4 give a response to these questions just kind 5 of a 30,000-foot level in general of what 6 you do would, different ideas you've done 7 over the years, that might be helpful.  8 THE WITNESS: Okay.  9 MR. SCHMIDT: Like types of things 10 you've done to research people, that sort of 11 thing.  12 Q. Please go ahead.  13 MR. SCHMIDT: Yeah, go ahead.  14 A. With what?  15 Q. What he just asked.  16 A. Go ahead, ask me the question again.  17 Q. Can you please give an overview of the 18 types of research investigations that Strategic 19 Vision does and how they do them?  20 A. We look at individual clients or groups 21 or companies or areas of interest on behalf of 22 our clients, whether it's international, whether 23 it's domestic.  24 Q. And how many investigations over the 25 years has Strategic Vision handled?	1 Q. And Strategic Vision doesn't have any 2 employees?  3 A. No.  4 MR. GRENDI: Let's do Exhibit 1 here. 5 (Wallop Exhibit 1, Notice of 6 Deposition, marked for identification.) 7 Q. Ms. Wallop, do you recognize this 8 document?  9 A. I'm sure it's in the file. I don't 10 recognize it particularly.  11 Q. If you turn to the third page there, do 12 you see that, Attachment A?  13 A. Yes.  14 Q. And just generally speaking, do you 15 understand that this is a 30(b)(6) deposition 16 notice?  17 A. Yes.  18 Q. And did you review this document prior 19 to today?  20 A. Actually, I did not.  21 Q. Did you prepare for this deposition in 22 any way?  23 A. Of course.  24 Q. You met with your attorneys? And I'll 25 just caution you right away, don't tell me
Page 23	Page 25
1 A. Oh, my goodness, I have no idea.  2 Q. Ballpark?  3 A. I have no idea.  4 Q. Fifty?  5 A. No. I would say probably, maybe 15, 6 20, something like that.  7 Q. That's since 2005?  8 A. It's probably more than that, but since 9 2005, yeah.  10 Q. Okay. And other than investigatory 11 services, what kind of services does Strategic 12 Vision provide?  13 A. As I've said earlier, we work with 14 clients on advisory services for family offices.  15 Q. That's part of Strategic Vision's 16 business?  17 A. I've already stated that.  18 Q. You mentioned another entity, that's 19 why I wasn't sure if you'd separated the two 20 entities or you --  21 A. No, you were very sure. You didn't -- 22 that's not a fair statement.  23 MR. SCHMIDT: Just answer the question, 24 French.  25 THE WITNESS: Okay.	1 anything you said to your attorneys or your 2 attorneys said to you.  3 A. Well, exactly, of course I discussed it 4 with my attorneys.  5 Q. And did you meet and go over documents 6 in preparation for this deposition?  7 MR. SCHMIDT: You can say yes or no.  8 A. Yes.  9 Q. How long did you do that for?  10 A. Today, or ever, or?  11 Q. All in, sure, all together.  12 A. Sure. I have no idea what the answer 13 would be.  14 MR. SCHMIDT: Just do the best you can.  15 A. Okay. How about -- for today's 16 deposition?  17 Q. Yes.  18 A. Okay. How about 3 hours, by telephone 19 or something.  20 MR. SCHMIDT: We had met in person 21 before, you should tell him that.  22 A. Oh, we had a coffee before, or I had a 23 coffee.  24 Q. And you prepared with your attorney 25 here, Mr. Schmidt?

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<p style="text-align: right;">Page 26</p> <p>1 A. Yes.</p> <p>2 Q. Did you go over any documents?</p> <p>3 A. No.</p> <p>4 MR. SCHMIDT: I think you should tell 5 him that, at the initial meeting we had, we 6 went over the --</p> <p>7 A. Oh, well, of course --</p> <p>8 MR. SCHMIDT: -- the documents. That 9 counts as well. You should --</p> <p>10 THE WITNESS: I thought he was talking 11 about the 30 minutes that we met for coffee 12 before we walked across the street. So, 13 okay.</p> <p>14 MR. SCHMIDT: Fill out the record.</p> <p>15 THE WITNESS: So, all right. Yeah, no, 16 obviously.</p> <p>17 Q. Let's clean that up, just so I 18 understand. Did you go over documents in 19 preparation for this deposition?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Let's go to the next document. 22 Just generally speaking, you understand that I'll 23 be asking questions addressed to Strategic 24 Vision. In response to those, you'll be 25 answering on behalf of Strategic Vision; you</p>	<p style="text-align: right;">Page 28</p> <p>1 Dr. Waller -- or, I'm sorry, Lianchao Han?</p> <p>2 A. It's public.</p> <p>3 Q. I understand that.</p> <p>4 A. I have no idea whether they saw it or 5 not.</p> <p>6 Q. I'm asking whether you personally gave 7 it to them?</p> <p>8 A. I have no idea.</p> <p>9 MR. SCHMIDT: Do you remember giving it 10 to them?</p> <p>11 THE WITNESS: No.</p> <p>12 Q. Okay. And it says here, "over a 13 40-year period, the principal has developed and 14 maintained connections with many U.S. 15 administrations, Congress, DOD, DOE and other 16 agencies." Do you see that?</p> <p>17 A. Correct.</p> <p>18 Q. And that's your network of contacts 19 being referred to there?</p> <p>20 A. Correct.</p> <p>21 Q. And if you look a little further down 22 the page, it mentions strategic research, do you 23 see that?</p> <p>24 A. Yes.</p> <p>25 Q. Is that investigatory research; I mean,</p>
<p style="text-align: right;">Page 27</p> <p>1 understand that, right?</p> <p>2 A. Correct.</p> <p>3 MR. GRENDI: This is Exhibit 2. (Wallop Exhibit 2, Document Bates 5 stamped Eastern 000017, marked for 6 identification.)</p> <p>7 Q. Ms. Wallop, I've handed you a document 8 that has the Bates number Eastern 17 in the 9 bottom right-hand corner of the first page, do 10 you see that?</p> <p>11 A. Correct.</p> <p>12 Q. Just so you -- for the clarity of the 13 record and for your own edification, sometimes 14 I'll be referring to documents by their Bates 15 number, just to be clear, and I just want to make 16 sure you know what a Bates number was.</p> <p>17 A. Thank you.</p> <p>18 Q. Do you recognize this document?</p> <p>19 A. It looks like a LinkedIn document or 20 print-off.</p> <p>21 Q. So did you create the content in this 22 document?</p> <p>23 A. Yes.</p> <p>24 Q. And did you ever give this information 25 to Mr. Guo or Yvette Wang or Michael -- or</p>	<p style="text-align: right;">Page 29</p> <p>1 what does that mean?</p> <p>2 A. It can be.</p> <p>3 Q. What about competitive intelligence, 4 that's the last item there?</p> <p>5 A. Yes. What about it?</p> <p>6 Q. Is that inclusive of investigatory 7 private research or investigations?</p> <p>8 A. In some cases, yes.</p> <p>9 Q. Is private investigations a specialty 10 of Strategic Vision or does it really provide a 11 broader suite of services?</p> <p>12 A. Broader suite, but it's inclusive of 13 that, if required.</p> <p>14 Q. Would you consider investigatory 15 research a core service of Strategic Vision?</p> <p>16 MR. SCHMIDT: Objection. Go ahead.</p> <p>17 A. No.</p> <p>18 Q. So it's kind of like a side service 19 that Strategic Vision provides?</p> <p>20 MR. SCHMIDT: Same objection, but go 21 ahead.</p> <p>22 A. It depends on the client's request.</p> <p>23 Q. So sometimes it's the general focus of 24 Strategic Vision's service to a client and other 25 times it's not even part of the service?</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. Correct.</p> <p>2 Q. Does Strategic Vision provide lobbying</p> <p>3 services?</p> <p>4 A. Again, that depends on the client. We</p> <p>5 don't do it directly, but we will work with</p> <p>6 people that are lobbyists.</p> <p>7 Q. So sometimes --</p> <p>8 A. Sometimes.</p> <p>9 Q. -- Strategic Vision provides lobbying</p> <p>10 services?</p> <p>11 A. Sometimes, yes.</p> <p>12 MR. GRENDI: This is 3.</p> <p>13 (Wallop Exhibit 3, Document Bates</p> <p>14 stamped SVUS000077, marked for</p> <p>15 identification.)</p> <p>16 Q. Ms. Wallop, do you recognize this</p> <p>17 document?</p> <p>18 A. I do.</p> <p>19 Q. What is it?</p> <p>20 A. It is a preliminary sort of vision for</p> <p>21 Miles Guo, for our first meeting, I believe, with</p> <p>22 him, that both Mike Waller, Dr. Waller and I</p> <p>23 worked on.</p> <p>24 Q. So the handwriting on the top right</p> <p>25 corner, is that your handwriting?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. I think sometime in late October or</p> <p>2 early November.</p> <p>3 Q. Of what year?</p> <p>4 A. 2017.</p> <p>5 Q. Do you recall if it was Mr. Gertz or</p> <p>6 Mr. Han that called you, or how did that</p> <p>7 interaction occur?</p> <p>8 A. That's a good question. I think it was</p> <p>9 Bill Gertz. I think he may have called me.</p> <p>10 Q. And what did he tell you?</p> <p>11 A. He knew that I had been working in the</p> <p>12 past for Taiwan and had been very active in</p> <p>13 pro-democracy work, and I think he said at that</p> <p>14 point he would like to have lunch with me, and,</p> <p>15 possibly, Lianchao was at that first lunch. I</p> <p>16 think that was how it went.</p> <p>17 Q. Those were the three people who were</p> <p>18 present at that lunch?</p> <p>19 A. Yes. The three of us, yes.</p> <p>20 Q. And what was discussed there?</p> <p>21 A. He discussed Mr. Guo, and that he had</p> <p>22 met with him, I guess, a number of times, I don't</p> <p>23 know over what period of time, but that he</p> <p>24 believed that he was looking for a group that</p> <p>25 could help change his -- Mr. Guo -- Miles Guo's</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Yes.</p> <p>2 Q. And when did you make that note, if you</p> <p>3 recall?</p> <p>4 A. I'd have to -- to look on my paper</p> <p>5 calendar. I don't remember.</p> <p>6 Q. You have a paper calendar that you</p> <p>7 keep?</p> <p>8 A. No. I'd have to look -- I'd have to</p> <p>9 look. I remember it was sort of -- there was --</p> <p>10 there was one meeting in early December, and I</p> <p>11 don't have that with me.</p> <p>12 Q. Ms. Wallop, do you keep a calendar?</p> <p>13 A. No, I don't keep anything on -- I keep</p> <p>14 notes, sticky notes, so.</p> <p>15 Q. You don't keep like a Google</p> <p>16 calendar --</p> <p>17 A. No.</p> <p>18 Q. -- or electronic calendar?</p> <p>19 A. God, no.</p> <p>20 Q. You keep paper Post-it notes to track</p> <p>21 your meetings and schedule?</p> <p>22 A. Yes.</p> <p>23 Q. How were you introduced to Mr. Guo?</p> <p>24 A. Through Bill Gertz and Lianchao Han.</p> <p>25 Q. And when did that come about?</p>	<p style="text-align: right;">Page 33</p> <p>1 image in America. He explained a little bit</p> <p>2 about Miles Guo's issues, and we discussed at the</p> <p>3 time how perhaps there might be a way of helping</p> <p>4 him stay in the United States.</p> <p>5 Q. What were the issues that you just</p> <p>6 mentioned?</p> <p>7 A. Pro-communist people that were</p> <p>8 apparently after him. There were many lawsuits</p> <p>9 apparently that had been filed against Mr. Guo.</p> <p>10 We didn't know anything about Mr. Guo, per se,</p> <p>11 other than some of the media reports.</p> <p>12 So Lianchao suggested that we meet with</p> <p>13 him, and I said, well, I will -- I'll think about</p> <p>14 it and get back to you.</p> <p>15 Q. And so, you said before that you knew</p> <p>16 Mr. Gertz from years in politics or what's</p> <p>17 your --</p> <p>18 A. He used to be, he still is, he's still</p> <p>19 at the Washington Times, and he writes for the</p> <p>20 Washington Times, and he's now with the</p> <p>21 Washington -- Washington Times.</p> <p>22 MR. SCHMIDT: Times or Post?</p> <p>23 THE WITNESS: Washington Times. Good</p> <p>24 God, not the Washington Times.</p> <p>25 Q. It's a different -- it's a different</p>

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<p style="text-align: right;">Page 34</p> <p>1   outfit.</p> <p>2       A.   Yeah. And the -- it's certainly    3   conservative, it was run under the time when    4   Arnaud de Borchgrave was the editor, along with    5   several other close friends, and he's now at the    6   Washington Free Beacon, I think, mostly.</p> <p>7       Q.   Is that another right of center    8   publication?</p> <p>9       A.   Um-hum. I think I would call it a    10   center and conservative. I wouldn't call it    11   right of center.</p> <p>12       Q.   I was --</p> <p>13       A.   I mean, really?</p> <p>14       Q.   -- asking for your -- I was asking for    15   your understanding of it.</p> <p>16       A.   Well, you've got my understanding of    17   it.</p> <p>18       Q.   Thank you.</p> <p>19       A.   You're welcome.</p> <p>20       Q.   And how do you know Lianchao Han?</p> <p>21       A.   Lianchao and I have crossed paths in    22   Washington off and on over the years, maybe    23   because of some of the Taiwan activities in    24   Washington. But I've always sort of known him    25   and liked him. I never worked with him. But</p>	<p style="text-align: right;">Page 36</p> <p>1   about?</p> <p>2       A.   Well, I talked -- I mentioned to Bill,    3   I said, one of the people that I like a lot and    4   have worked with on a couple of things, but not    5   monetary, but just ideological, was Dr. Waller,    6   and I'd like to bring Dr. Waller in on this. And    7   he said, wow, that would be phenomenal. So, here    8   we are.</p> <p>9       Q.   And did you speak to Mr. Guo before    10   putting this document together or was this just    11   based on your conversations with Mr. Han and    12   Mr. Gertz?</p> <p>13       A.   I know that we had a preliminary one,    14   then we met with Mr. Guo, we did something    15   similar to this and gave it to him, I believe,    16   and -- and then we had, obviously, several other    17   meetings after that with Mr. Guo.</p> <p>18       Q.   So, just speaking about this first    19   meeting. Where did it occur?</p> <p>20       A.   With Mr. Guo?</p> <p>21       Q.   Yes.</p> <p>22       A.   Okay. In his apartment at the    23   Sherry-Netherland, his penthouse.</p> <p>24       Q.   And when was that?</p> <p>25       A.   I don't have a date on here, so I can't</p>
<p style="text-align: right;">Page 35</p> <p>1   he's an excellent individual.</p> <p>2       Q.   Did Strategic Vision pay any referral    3   fees or any other consideration to Mr. Han for    4   introducing Mr. Guo to you?</p> <p>5       A.   Good Lord, no.</p> <p>6       Q.   What about Mr. Gertz?</p> <p>7       A.   Never.</p> <p>8       Q.   Okay. And going back to this first    9   meeting document. Did you present this document    10   to Mr. Guo or was this just you and Mr. Waller's    11   notes?</p> <p>12       A.   I know that we presented one that was    13   very similar to this, and I think a bit more --    14   it might have been a bit more extensive, but it    15   encapsulated. We were probably trying to keep it    16   short and concise, but we did -- we did work on    17   this vision based upon what both Mr. Gertz and    18   Lianchao had told us about him and what his sort    19   of ambitions were for remaining in the United    20   States.</p> <p>21       Q.   So did you and Dr. Waller create this    22   document after your meeting with Mr. Han and    23   Mr. Gertz?</p> <p>24       A.   Yes.</p> <p>25       Q.   And how did that collaboration come</p>	<p style="text-align: right;">Page 37</p> <p>1   tell you.</p> <p>2       Q.   From your memory.</p> <p>3       A.   Well, it would have been in December at    4   some point.</p> <p>5       Q.   December 2017?</p> <p>6       A.   Yes, sorry.</p> <p>7       Q.   That's okay. What occurred at that    8   meeting? What did you present and what did    9   Mr. Guo say?</p> <p>10       A.   I believe Lianchao was also there -- I    11   know he was there, and Dr. Waller and I were    12   there, and we discussed his -- that is, Miles    13   Guo's life, his intentions, his questions about    14   investigative work; all of that was part of the    15   conversation.</p> <p>16       He wanted to be -- he wanted to have a    17   presence in Washington, he wanted to buy real    18   estate in Washington, he wanted to buy a very    19   large bank building in Washington right across    20   from the White House, he wanted to buy a huge    21   house in Washington. All of these things were    22   part of his sort of image building.</p> <p>23       Q.   And those were his ideas?</p> <p>24       A.   Yes.</p> <p>25       Q.   But you hadn't met with Mr. Guo before</p>

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<p style="text-align: right;">Page 38</p> <p>1 this meeting, right?</p> <p>2 A. No. But the meeting went on for hours</p> <p>3 and hours and hours. You're asking what was the</p> <p>4 content of the meeting.</p> <p>5 Q. Yes.</p> <p>6 A. Yes, that's what I'm saying.</p> <p>7 Q. So was this document written during the</p> <p>8 meeting or before?</p> <p>9 A. I think this one may have been -- may</p> <p>10 have been before, but -- yes, I think it was</p> <p>11 before, because it doesn't mention the real</p> <p>12 estate and so forth that he got into during the</p> <p>13 meeting. So this might have been sort of like</p> <p>14 a -- it is sort of a vision paper, based on a</p> <p>15 conversation with Mr. -- with Bill Gertz and with</p> <p>16 Lianchao Han.</p> <p>17 Q. What do you recall saying about</p> <p>18 Strategic Vision's capabilities and background?</p> <p>19 Actually, let's just start with capabilities.</p> <p>20 Do you recall presenting about what</p> <p>21 Strategic Vision could do for Mr. Guo?</p> <p>22 A. We were talking ideologically mostly</p> <p>23 about what could be done to help present his</p> <p>24 views on communist China, on mainland China. And</p> <p>25 so we didn't get into specifics at the very</p>	<p style="text-align: right;">Page 40</p> <p>1 been.</p> <p>2 Q. What do you remember about that?</p> <p>3 A. I remember that we discussed that Miles</p> <p>4 Guo said that he had a number of people that he</p> <p>5 wanted to know more about that were in mainland</p> <p>6 China, but we didn't have any specifics at that</p> <p>7 time what he was talking about.</p> <p>8 Q. Did Strategic Vision mention that it</p> <p>9 could provide that information or that it had</p> <p>10 that capability?</p> <p>11 A. I don't recall. It could have.</p> <p>12 Q. Turning to the last page there, SV79.</p> <p>13 It says, "Mr. G should maintain his statesmanlike</p> <p>14 status by not engaging in everyday defense or</p> <p>15 counterattack, and should leave it up to his own</p> <p>16 surrogates."</p> <p>17 Do you see that?</p> <p>18 A. Where is that?</p> <p>19 Q. It's the first sentence of the last</p> <p>20 paragraph.</p> <p>21 A. Oh, the regime, yeah. Okay. "Those</p> <p>22 surrogates will be in journalism, academia,</p> <p>23 business, policy." Yes, yes. Okay.</p> <p>24 Q. Do you remember talking about that</p> <p>25 subject at this meeting?</p>
<p style="text-align: right;">Page 39</p> <p>1 beginning. We just started sort of having an</p> <p>2 initial conversation about how -- how we felt he</p> <p>3 could be represented in Washington and how we</p> <p>4 could show his positive side.</p> <p>5 Q. And did you explain what Strategic</p> <p>6 Vision does or how Strategic Vision could help</p> <p>7 with that?</p> <p>8 A. Probably.</p> <p>9 Q. Do you recall what, if anything, you</p> <p>10 said about that?</p> <p>11 A. Not precisely, no. Generalities. This</p> <p>12 was someone we just met, and it is the custom in</p> <p>13 Asia not to dive into a lot of details unless</p> <p>14 you're asked.</p> <p>15 Q. So did Mr. Lianchao Han or Mr. Guo ask</p> <p>16 about Strategic Vision's capabilities?</p> <p>17 A. Eventually.</p> <p>18 Q. But not at this meeting?</p> <p>19 A. Not entire -- I don't recall.</p> <p>20 Q. Okay.</p> <p>21 A. But they could have, but I don't</p> <p>22 precisely recall.</p> <p>23 Q. Was investigatory research discussed in</p> <p>24 any detail at this first meeting?</p> <p>25 A. It could have been. It could have</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Probably.</p> <p>2 Q. And what do you remember?</p> <p>3 A. I don't remember precisely. It's over</p> <p>4 a year ago.</p> <p>5 Q. And you don't remember what Mr. Guo</p> <p>6 said about that, or anybody else?</p> <p>7 A. It was a general, initial conversation</p> <p>8 with somebody that we did not know, and we were</p> <p>9 asked to produce something that we felt could be</p> <p>10 a good vision for him to consider, perhaps, yeah.</p> <p>11 (Wallop Exhibit 4, Document entitled</p> <p>12 "Three-Year Timeline" Bates stamped</p> <p>13 SVUS000080, marked for identification.)</p> <p>14 Q. Do you recognize what's been marked as</p> <p>15 Waller 4?</p> <p>16 A. Yes.</p> <p>17 Q. And what is this document?</p> <p>18 A. Wallop.</p> <p>19 Q. Oh, sorry, Wallop. I apologize. The</p> <p>20 W. Wallop 4.</p> <p>21 A. Yes.</p> <p>22 Q. Did you create this document?</p> <p>23 A. Yes. Mike and I did.</p> <p>24 Q. When was that?</p> <p>25 A. That was at the second meeting with</p>

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<p>1 Miles Guo.</p> <p>2 Q. So you remember literally typing and 3 creating this document during the meeting?</p> <p>4 A. Prior to the meeting.</p> <p>5 Q. Okay. And when was this second 6 meeting?</p> <p>7 A. Again, I'd have to ask Mike. I think 8 it was -- I know it was in December of 2017.</p> <p>9 Q. And who was present?</p> <p>10 A. Dr. Waller, Mike Waller, myself, 11 Lianchao, and, obviously, Miles Guo.</p> <p>12 Q. What was Lianchao's role in the 13 meeting; was he translating?</p> <p>14 A. Yes, mostly. And explaining, walking 15 through some of the explanations, not only the 16 translation, but, again, we were having a 17 generalized conversation.</p> <p>18 Q. And just for the clarity of the record. 19 Mr. Han was translating for Mr. Guo?</p> <p>20 A. Yes. Both ways.</p> <p>21 Q. Of course.</p> <p>22 A. Mr. Guo speaks very good English, so he 23 doesn't really need an interpreter, but it's 24 better to have one.</p> <p>25 Q. Did Mr. Han actually read this whole</p>	<p style="text-align: center;">Page 42</p> <p>1 A. He liked it very much.</p> <p>2 Q. Does that include all of the items in 3 this timeline or was he more receptive to some 4 services than others?</p> <p>5 A. It was interesting. He was very keen 6 on having a -- a big, a huge, large presence in 7 the way of a residence, and then also purchasing 8 the American Security and Trust building across 9 from the Treasury Department in Washington as an 10 office building for him. He liked the idea of 11 the Washington-based educational and cultural 12 foundation, which we thought might be a good way 13 of exposing him to or introducing him to 14 Washington and the Hill, and working on a more 15 positive anti-communist role.</p> <p>16 Q. And in terms of this real estate 17 portion of it, acquiring what, a residence?</p> <p>18 A. Yes.</p> <p>19 Q. And also an office building, I guess, 20 for a foundation?</p> <p>21 A. Yes. I just said that.</p> <p>22 Q. Yes. I understand. And so, is that a 23 service that Strategic Vision typically provides 24 for clients?</p> <p>25 A. Yes, sometimes.</p>	<p style="text-align: center;">Page 44</p>
<p>1 document to Mr. Guo and translate it for him; was 2 that part of the meeting?</p> <p>3 A. Yes. I think we walked through each 4 one of these paragraphs, yes.</p> <p>5 Q. And going back to the prior document, 6 Exhibit 3. Was the same process employed where 7 Mr. Han, to your understanding, was translating 8 the document for Mr. Guo?</p> <p>9 A. To my understanding, yes.</p> <p>10 Q. But, obviously, you don't speak 11 Mandarin, do you?</p> <p>12 A. A little bit. Not as much as I'd like.</p> <p>13 Q. Fair enough. But you're not fluent?</p> <p>14 A. No.</p> <p>15 Q. Okay. And so, to the extent you 16 recall, what occurred at this second meeting?</p> <p>17 A. This was a broader timeline based on 18 the first meeting and the first vision paper that 19 we had in our discussion, and this gave sort of a 20 menu, so to speak, a la carte, or menu of ideas 21 as to how we could help Miles Guo, at his 22 request, to set up sort of a strategic plan for 23 him.</p> <p>24 Q. So what was his response to the 25 presentation that you made?</p>	<p style="text-align: center;">Page 43</p> <p>1 Q. So Strategic Vision will help people 2 locate properties and acquire them?</p> <p>3 A. Correct.</p> <p>4 Q. Is that in the D.C. area or nationwide; 5 how does that work?</p> <p>6 A. Yes, both. D.C. area, nationwide, 7 globally, whatever.</p> <p>8 Q. And how was that, let's just call it 9 real estate project, followed up on subsequently?</p> <p>10 A. Well, actually, Lianchao -- I picked up 11 Lianchao and Yvette at a hotel downtown off M 12 Street, because she wanted to see all of the 13 properties that we had in mind. I think it must 14 have been obviously -- honestly I can't remember. 15 I think it was -- I think it was after this 16 second meeting, that she came to Washington, and 17 Lianchao lives in Washington, so we picked him 18 up, and I had a brochure, a set of brochures of 19 homes and the office building that we drove 20 around, because there are a lot of cameras in 21 Washington.</p> <p>22 We put her in the back seat with 23 Lianchao. I have a Jeep, so those windows happen 24 to have a, whatever it is, sun -- more blacked 25 out windows than the front two seats.</p>	<p style="text-align: center;">Page 45</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. Tinted windows?</p> <p>2 A. Tinted, yes. So we drove them around,</p> <p>3 and I pointed out the homes. I never made any</p> <p>4 appointments to see the homes, because the last</p> <p>5 thing we wanted to do was sort of bring Yvette or</p> <p>6 anybody else in to see the homes. We had the</p> <p>7 brochures that had all of the interiors in the</p> <p>8 homes, photographs, so she could easily see it.</p> <p>9 We went around Kalorama, we went around</p> <p>10 Georgetown, we went into what they call Spring</p> <p>11 Valley.</p> <p>12 Q. And, Ms. Wang, was this the first time</p> <p>13 you met her?</p> <p>14 A. No. She was also in one of those</p> <p>15 meetings, probably in the first meeting we had,</p> <p>16 this one, sorry; whenever the first meeting was</p> <p>17 with Guo, she was present.</p> <p>18 Q. So, I'm sorry, I just want to clarify</p> <p>19 the record then. Who was present at the first</p> <p>20 meeting that you had with Mr. Guo?</p> <p>21 A. I think Yvette, Lianchao, Dr. Waller,</p> <p>22 myself and Miles Guo.</p> <p>23 Q. Okay. And when was this --</p> <p>24 A. Walkabout?</p> <p>25 Q. Yeah. Little soldiering through the</p>	<p style="text-align: right;">Page 48</p> <p>1 \$50 million homes. You have to give a full</p> <p>2 background. I can say -- I can go in and look at</p> <p>3 it, but when I bring somebody like Yvette, and</p> <p>4 then I'd have to also identify Lianchao; it was</p> <p>5 better just to drive around, take a look, decide</p> <p>6 what sort of looked like something that both</p> <p>7 Lianchao and Yvette thought might fit his</p> <p>8 persona, and then go back and go and look at the</p> <p>9 homes, if that's what he wanted to do.</p> <p>10 Q. Did anything come of that --</p> <p>11 A. No.</p> <p>12 Q. -- process?</p> <p>13 A. No. And we did make a big foray into</p> <p>14 trying to get the Riggs Bank building, which is</p> <p>15 something that he wanted -- I'm sorry, excuse me,</p> <p>16 the American Security and Trust building, which</p> <p>17 is what he wanted, opposite the Treasury</p> <p>18 Department.</p> <p>19 Q. And what was that effort, if you could</p> <p>20 just generally describe that?</p> <p>21 A. Well, I called three or four people</p> <p>22 that I think were private owners somehow through</p> <p>23 a trust, and they told me repeatedly it wasn't</p> <p>24 for sale. And then I finally found out that of</p> <p>25 course it was for sale at the right price.</p>
<p style="text-align: right;">Page 47</p> <p>1 D.C. metro area?</p> <p>2 A. It was sometime in December. It must</p> <p>3 have been, you know, somewhere from the --</p> <p>4 somewhere between the 10th and the 20th of</p> <p>5 December of 2017.</p> <p>6 Q. And what did you understand that</p> <p>7 Ms. Wang and Mr. Guo were doing with that trip?</p> <p>8 What was their purpose in being there?</p> <p>9 A. She wanted to see the brochures that we</p> <p>10 had, and I think I -- I can't remember, I think I</p> <p>11 showed the Evermay property to Miles Guo during</p> <p>12 that second meeting. I happen to have a copy of</p> <p>13 it with me. I had to ask to get copies of the</p> <p>14 other homes from Washington Fine Properties so</p> <p>15 that I knew what he wanted as far as large</p> <p>16 estates or large homes, and he wanted to have a</p> <p>17 presence, he wanted to be close enough to Capitol</p> <p>18 Hill.</p> <p>19 Q. And just going back. You didn't show</p> <p>20 them the interiors of the property because you</p> <p>21 were concerned about surveillance or --</p> <p>22 A. Well, the way it works is, if it's in</p> <p>23 Washington particularly, if you take an</p> <p>24 individual in, you have to identify the</p> <p>25 individual into multi-million-dollar, 10, 20, 30,</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Sure.</p> <p>2 A. And we hadn't even gotten down that far</p> <p>3 down the lane. So I don't know what the number</p> <p>4 would have been, but it was substantial, hundreds</p> <p>5 of millions.</p> <p>6 Q. And you were -- so were those the only,</p> <p>7 we'll call them sellers, you were in contact with</p> <p>8 in connection with this real estate project?</p> <p>9 A. Well, on the office building, yes.</p> <p>10 Q. What about with residential properties?</p> <p>11 A. Well, with Evermay, I was in touch --</p> <p>12 the previous owner of Evermay, sadly, who just</p> <p>13 died in November this year, the previous owner</p> <p>14 had been a childhood friend since I was 12, and</p> <p>15 they had recently sold, probably five years prior</p> <p>16 to this, they had recently sold Evermay to a</p> <p>17 Japanese couple in the pharmaceutical business.</p> <p>18 Fast forward, Japanese couple was</p> <p>19 getting divorced. Fast forward as well, the</p> <p>20 previous owners of Evermay had a first right of</p> <p>21 refusal; should they decide to buy the property</p> <p>22 back from the Japanese couple, they could, in</p> <p>23 their contract.</p> <p>24 So I went to -- his name was Harry</p> <p>25 Belin. I went to Harry Belin and talked to him</p>

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<p style="text-align: right;">Page 50</p> <p>1 about Evermay for Miles Guo, because it would  2 have been a perfect, perfect house for Miles. He  3 could have incorporated his 501(c)(3) in that  4 house, because it was used as a 501(c)(3)  5 foundation by both Harry Belin and the Japanese  6 pharmaceutical couple.</p> <p>7 Since there was no movement, we didn't  8 go any further on it, because Miles obviously  9 didn't -- I don't know. I don't know what  10 happened.</p> <p>11 Q. You kind of anticipated my next  12 question. When did this kind of process stop or  13 end?</p> <p>14 A. Miles was mostly really, really anxious  15 to move on the investigative side of the famous  16 file that you're aware of.</p> <p>17 Q. Sure.</p> <p>18 A. So, on the individuals. I have no  19 idea -- he changes his mind all the time, so I  20 have no idea what his change of heart was on  21 that.</p> <p>22 Q. When did -- if you recall, when did the  23 conversation or negotiations pivot to this  24 investigatory research area?</p> <p>25 A. Probably during the second meeting.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. That was in that December 2017 time,  2 yes.</p> <p>3 Q. What was -- was it research that was  4 offered or did Mr. Guo ask for that?</p> <p>5 A. I believe he gave us a name, and I  6 believe that we then had an exploratory peek into  7 what we could find initially.</p> <p>8 Q. So what was that exploratory research?  9 What was done by Strategic Vision?</p> <p>10 A. It was a -- it was done by our team, or  11 the initial team, before we even had a team, that  12 was contracted by us. This was sort of a  13 freebie, to take a peek into this individual's  14 name, whatever, background. And he gave us the  15 name. I believe it was the number 1 name on the  16 folder that you have.</p> <p>17 Q. Is that Anita Suen?</p> <p>18 A. Yeah.</p> <p>19 Q. And that name was given to someone who  20 has been described by Strategic Vision as the  21 leader of Team 1? Was that the --</p> <p>22 A. What? I'm sorry, I don't understand  23 that question at all.</p> <p>24 Q. Maybe we'll get to it, we can define  25 it. Let's just put it this way. Who was that</p>
<p style="text-align: right;">Page 51</p> <p>1 Mike has got a much better memory about these  2 things.</p> <p>3 Q. Do you recall how that occurred, was it  4 that Strategic Vision presented its investigatory  5 capabilities and Mr. Guo got excited or did he  6 ask about it; what occurred?</p> <p>7 A. We were -- again, we were speaking  8 about it in generalities. It's not something you  9 boast about. It's not something you discuss in a  10 way that is -- well, it's just not something you  11 boast about. You can discuss it, you can discuss  12 the activities that can happen, and on a  13 hypothetical basis.</p> <p>14 Q. Did there come a time when Strategic  15 Vision offered to provide the sample  16 investigatory research on this --</p> <p>17 A. Yes.</p> <p>18 Q. -- vein of services?</p> <p>19 A. Yes, I believe there was.</p> <p>20 Q. When was that?</p> <p>21 A. I don't have the date.</p> <p>22 Q. Just generally, was it in this  23 December --</p> <p>24 A. It was in that December --</p> <p>25 Q. -- 2017 time frame?</p>	<p style="text-align: right;">Page 53</p> <p>1 information regarding Anita Suen given to do  2 the research?</p> <p>3 A. Mike.</p> <p>4 Q. Oh, okay. Mike Waller?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know what Mr. Waller did with  7 that information?</p> <p>8 A. Not precisely, no.</p> <p>9 Q. What understanding at all did you have  10 of what Mr. Waller would do with that  11 information?</p> <p>12 A. He was going to explore some of his  13 channels.</p> <p>14 Q. Do you know Dr. Waller's what you  15 describe as channels or --</p> <p>16 A. No, not all of them, no.</p> <p>17 Q. So you don't know all of the --</p> <p>18 A. We have channels. We both have  19 channels. I have channels, he has channels.</p> <p>20 Q. And do you deliberately keep your  21 channels confidential or secret from one another  22 for --</p> <p>23 A. Yes.</p> <p>24 Q. And why is that?</p> <p>25 A. For security.</p>

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<p style="text-align: right;">Page 54</p> <p>1 Q. So this freebie research report, was    2 that research completed, or conducted?    3 A. It was conducted. It wasn't completed    4 by any stretch.    5 Q. Right. And so what was -- was anything    6 presented back to Mr. Guo or Han or Ms. Wang?    7 A. Yes. I believe, yes, we did show --    8 again, Mr. Han, Mr. Guo, Miles Guo, and Mike and    9 myself were privy to whatever Mike had found.    10 Q. So there was like a third meeting with    11 respect to this --    12 A. Yes, somewhere.    13 Q. -- pre-report?    14 A. Yes. In December of 2017.    15 Q. Okay. And where did that take place,    16 was it in New York?    17 A. Yes.    18 Q. What did Strategic Vision present as    19 this free report or free information?    20 A. They -- I believe they had a -- Mike    21 had a screenshot of a couple of things that he    22 showed Miles Guo.    23 Q. Was it information about accessing a    24 CITIC Bank account?    25 A. I believe so, yes. It wasn't</p>	<p style="text-align: right;">Page 56</p> <p>1 It wasn't very in depth. I think it might have    2 had some numbers on it, it might have had some    3 account numbers on it or something like that.    4 But it was basically just to show how    5 some things could be retrieved. We had to be    6 extremely careful. These things were only    7 retrieved outside of The United States, and if    8 they were -- they were never retrieved inside The    9 United States.    10 Q. And why was that?    11 A. Because it's not really a terribly good    12 thing to do.    13 Q. Is that because it's illegal or --    14 A. It's probably illegal, yes. So we    15 would never do anything illegal.    16 MR. SCHMIDT: In The United States.    17 THE WITNESS: In The United States. Or    18 elsewhere, actually.    19 Q. And did this presentation involve    20 showing that there was money in the bank account    21 or anything of that nature?    22 A. I don't remember. I saw it so quickly,    23 I -- because it was really Guo and either Yvette    24 or Lianchao looking at it. I wasn't looking at    25 it.</p>
<p style="text-align: right;">Page 55</p> <p>1 accessing. Please understand, there's a huge    2 difference.    3 Q. Oh, please. I want you to explain.    4 What was presented? That's what I want to    5 understand.    6 A. Yes. There's a huge difference between    7 accessing. It was not accessing. It was what    8 they call peeking. It was not invading into the    9 server.    10 Q. Okay.    11 A. Okay.    12 Q. What does peeking mean? I just want to    13 understand that clearly.    14 A. To look over the wall.    15 THE WITNESS: As I see, Yvette has    16 walked into the room.    17 MR. SCHMIDT: The court reporter will    18 take down the appearance. That's fine.    19 (Ms. Yvette Wang has joined the    20 deposition.)    21 THE WITNESS: So, Yvette Wang has just    22 walked into the room.    23 A. So, the peeking was a screenshot, I    24 believe, and I only saw it for a flash myself, of    25 a CITIC name and maybe an address or something.</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. Had you looked at these screenshots or    2 information prior to the meeting?    3 A. No, I don't believe I did.    4 Q. Okay.    5 A. Because, again, we compartmentalize    6 stuff.    7 Q. So that was Dr. Waller's aspect of this    8 presentation, he handled that?    9 A. I agree.    10 Q. Did you tell Eastern or the people    11 present that you had enough information about    12 this person, Ms. Suen, to prove that she had    13 committed crimes?    14 A. First of all, we had no idea who    15 Eastern was, so I don't know what you mean about    16 Eastern.    17 Q. I'm obviously talking about Eastern    18 Profit. Let's just put it this way --    19 A. Yeah, but we're not here about Eastern    20 Profit, as you understand. I never heard of    21 Eastern Profit until there was a contract.    22 Q. Right. Did you ever tell the people    23 present at this meeting that you had enough    24 information to prove that Ms. Suen had committed    25 crimes?</p>

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<p style="text-align: right;">Page 58</p> <p>1        A.    I don't recall. Mike would know the  2    answer to that.</p> <p>3        Q.    Do you recall Mr. Waller talking about  4    crimes or anything like that at this meeting?</p> <p>5        A.    I wouldn't call them crimes. I think  6    they were asking for investigative background.  7    Miles Guo wanted to have as much information  8    on -- investigative background on a couple of  9    people, and I think she was the first and only  10   person he actually gave me -- gave us the name  11   about earlier, as a sort of trial.</p> <p>12       Q.    And you understood that Strategic  13   Vision wouldn't be compensated for this --</p> <p>14       A.    No.</p> <p>15       Q.    -- project?</p> <p>16       A.    Not -- well, we --</p> <p>17       Q.    And what I mean by project is this  18   little presentation?</p> <p>19       A.    No. It was just to show them what we  20   had a certain capacity of being able to do. It  21   was a limited capacity at that time.</p> <p>22       Q.    Do you understand why the information  23   was requested, what the goal was?</p> <p>24       A.    The goal was probably to sort of maybe  25   test some of the work that we could do</p>	<p style="text-align: right;">Page 60</p> <p>1        A.    But you're asking about the content of  2    the conversation and where it went and who was  3   involved and why --</p> <p>4        Q.    Um-hum.</p> <p>5        A.    -- right?</p> <p>6        Q.    I'm asking whether or not you knew why  7   the research was requested. That's what I'm  8   trying to understand.</p> <p>9        A.    We have no idea what Yvette did with  10   it. We have no idea what Guo did with it. We  11   have no idea what happened to it.</p> <p>12       Q.    So Strategic Vision didn't care what  13   the research was going to be used for one way or  14   another?</p> <p>15       A.    We cared very much what it was going to  16   be used for. We are very adamantly  17   anti-communist.</p> <p>18       Q.    I see.</p> <p>19       A.    We are very pro-democracy. Both Mike  20   and I are adamantly pro-democracy.</p> <p>21       Q.    So did you understand that the research  22   would be used to fight against the communist  23   party in China?</p> <p>24       A.    Correct. We thought. We were not sure  25   what they were going to do with it. Maybe he was</p>
<p style="text-align: right;">Page 59</p> <p>1        A.    compartmentally.</p> <p>2        Q.    Let me just be a little more specific  3    then. Did you understand what the end goal of  4    the research project as a whole was, what the  5   requesters of the information were trying to do?</p> <p>6        A.    For the entire project?</p> <p>7        Q.    Yes. Why did they want this  8   investigatory research?</p> <p>9        A.    Well, that's a really good question.</p> <p>10       Q.    That's why I'm asking. Do you know?</p> <p>11       MR. SCHMIDT: If you know or you don't.</p> <p>12       A.    I don't know.</p> <p>13       Q.    Okay. You never discussed what the  14   research would be used for or anything like that  15   with Mr. Guo or Ms. Wang or Mr. Han?</p> <p>16       A.    No.</p> <p>17       Q.    Did you think that it was involved with  18   the political conversations you guys had had  19   concerning China, the communist party?</p> <p>20       A.    Oh, I'm sure it had to do with the  21   communist party. I mean, Yvette certainly was  22   part of the communist party, and her parents were  23   part of the communist party regime. So, and she  24   was --</p> <p>25       Q.    I didn't ask you about that at all.</p>	<p style="text-align: right;">Page 61</p> <p>1        going to run it both ways. We don't know.</p> <p>2        Q.    I'm only asking what you thought.</p> <p>3        A.    Well, I just gave you my opinion.</p> <p>4        Q.    Of course. And so, did you understand  5   that the investigatory research that was  6   collected would ultimately be publicized?</p> <p>7        A.    Probably, if we ended up with -- I  8   mean, that was up to Guo to decide what he was  9   going to do with it. We certainly were not going  10   to publish it because we had strict  11   confidentiality agreements, but he didn't,  12   apparently, because he published a number of the  13   slides already on his sites.</p> <p>14       Q.    Let's just talk about the  15   confidentiality agreement. What do you mean by  16   that, when you said you had confidentiality  17   agreements?</p> <p>18       A.    We had -- well, that was later in the  19   agreement itself.</p> <p>20       Q.    Oh, that's what you're referring to.  21   Okay.</p> <p>22       A.    Well, you know precisely what I'm  23   referring to.</p> <p>24       MR. SCHMIDT: Just answer the  25   questions.</p>

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1	Q. I really don't. I'm just trying to	1 that?
2	be --	2 A. Yes.
3	THE WITNESS: I know, he knows what I'm	3 Q. Can you describe what this capability
4	referring to.	4 is? It says it was originally developed by the
5	Q. I actually don't, so you'll have to	5 U.S. military.
6	forgive me. And so, what was the response to	6 A. Yes, this is one of the things that
7	this presentation of the CITIC, as you -- what	7 Mike was aware of.
8	did you describe it as, the peering over the	8 Q. Are you aware of it, or you don't know
9	wall?	9 about this service?
10	A. I'm sorry?	10 A. I'm aware of it, but he's more
11	Q. What was the response of Mr. Han or	11 experienced with it.
12	Ms. Wang or Mr. Guo to your presentation?	12 Q. Well, let's -- what do you know about
13	A. I suppose they were interested. I	13 it?
14	wasn't -- I wasn't that surprised that something	14 A. Exactly what it says. I mean, I'm
15	couldn't be brought up off the internet from some	15 aware of it. I don't know any more than -- than
16	of the investigators that Mike would have known	16 that. Mike is the one who is fully aware of it.
17	about.	17 Q. I appreciate that Mr. Waller might know
18	Q. So, in other words, you understood that	18 more about it than you, but I'm asking what you
19	this was what Mike's team or contacts could	19 know.
20	provide?	20 A. I'm aware of what this paragraph says.
21	A. Yes.	21 Q. You don't know anything else about this
22	Q. Did you feel that the recipients of	22 capability or what it is?
23	this information were impressed by it?	23 A. I'm aware of the social media and text
24	A. I have no idea.	24 messaging communications in multiple languages.
25	Q. They didn't say anything like, wow,	25 Q. Okay. But you don't provide this
Page 63		Page 65
1	this is great or --	1 service, this isn't something that Strategic
2	A. I have no idea.	2 Vision does itself?
3	Q. You mean you don't remember or you just	3 A. Only through our teams do we do this.
4	don't --	4 Q. Okay. Is this service part of
5	A. I have no idea.	5 investigatory research or is it separate?
6	Q. So you know the information was	6 A. It would probably be part of the full
7	presented, but you don't recall how it was	7 package. We were not sure what Miles Guo wanted,
8	received?	8 so we tried to create a sort of a menu, as I
9	A. I'm sure it was favorable.	9 mentioned earlier.
10	MR. GRENDI: Let's take a little break	10 Q. So this document contains ideas for
11	and we'll come back in five or 10 minutes.	11 Mr. Guo in terms of services that Strategic
12	THE VIDEOGRAPHER: Going off the record	12 Vision can provide?
13	at 11:09.	13 A. Correct. Strategic Vision and its
14	(Whereupon, a short recess was taken.)	14 team.
15	THE VIDEOGRAPHER: We're now back on	15 MR. GRENDI: This is going to be Wallop
16	the record at 11:21.	16 5.
17	BY MR. GRENDI:	17 (Wallop Exhibit 5, Handwritten
18	Q. Just turning to SVUS84 of that exhibit,	18 document, marked for identification.)
19	that's the Bates number in the bottom right-hand	19 Q. Looking at Wallop 5, is this your
20	corner.	20 handwriting here?
21	A. Yes. Yes, yes, yes. So 84, okay. 83.	21 A. It is.
22	84, yes.	22 Q. And who are these individuals listed on
23	MR. SCHMIDT: Final page.	23 this document?
24	Q. You see where it says, "Total Social	24 A. Guo asked for some references of
25	Media Awareness," there's a bullet point for	25 individuals in the Middle East, and I wrote them

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		Page 70	Page 72
1	about the fraud beyond --		
2	THE WITNESS: Yes.		1 Q. And which family is that?
3	MR. SCHMIDT: -- what you read in the		2 A. The Al Nahyan family.
4	media?		3 Q. Is that on this list? I'm sorry, I
5	THE WITNESS: Yes.		4 have trouble reading your handwriting.
6	Q. Okay. And that's from who; how did you		5 A. Yes, it is.
7	hear about that?		6 Q. That's the one, two, three, four --
8	You can look at me. I'm asking you the		7 fifth one from the top?
9	questions.		8 A. Yes.
10	A. Privileged -- privileged sources.		9 Q. And what did they say to you about
11	Q. Okay. So you're refusing to answer		10 that?
12	that question based on privilege?		11 A. When I mentioned his name, they said
13	A. Yes.		12 that, yes, they were fully aware of him and that
14	Q. And what privilege is that?		13 it was not a pleasant experience.
15	MR. SCHMIDT: Do you want to go talk		14 Q. Why were you talking to the Al Nahyan
16	about it?		15 family about Mr. Guo?
17	THE WITNESS: Yes.		16 A. Because Mr. Guo, I believe, had been
18	MR. SCHMIDT: Why don't we go off the		17 telling me with this document that he knew all of
19	record and see what's going on.		18 these people, and I was checking on whether he
20	MR. GRENDI: I'll tell you what, why		19 did know any of these people. And so it came up
21	don't we just put a pin in it, and keep		20 that he defrauded the UAE and the family of over
22	going.		21 \$3 billion, as you well know.
23	MR. SCHMIDT: That's fine, too. Okay,		22 Q. And you didn't agree to keep your
24	we can do it at a break.		23 relationship with Mr. Guo confidential when you
25	MS. TESKE: Let's take a break for a		24 were speaking with him?
		Page 71	
1	quick second.		25 A. That had nothing to do with
2	THE VIDEOGRAPHER: Off the record at		
3	11:29.		
4	(Whereupon, a short recess was taken.)		
5	THE VIDEOGRAPHER: Back on the record		
6	at 11:35.		
7	MR. SCHMIDT: We just stepped out to		
8	discuss if there was any potential privilege		
9	issue. I think it's more of a		
10	confidentiality issue. She had actually		
11	already revealed the answer to the question		
12	in response to a prior question. And I		
13	think the question when we left was if she		
14	knew anything beyond what she had read in		
15	the public papers, and the answer was yes.		
16	And I think your next question was, what.		
17	And I think Ms. French is ready to respond		
18	to that.		
19	Q. Go ahead. How do you know something		
20	beyond the public record about Mr. Guo allegedly		
21	stealing \$3-1/2 billion from the United Arab		
22	Emirates?		
23	A. Based on conversations that I had with		
24	members of the family with whom he allegedly		
25	defrauded them of over \$3 billion.		
		Page 73	
1	confidentiality. He was the one that gave me --		
2	he asked me for these references. I wanted to		
3	make sure we had a reference on him. He said		
4	that he worked very closely with the UAE, and it		
5	turned out, I guess, he did.		
6	Q. When were these conversations you had		
7	with the Al Nahyan family?		
8	A. Oh, probably in -- probably about six		
9	months after the contract began.		
10	Q. So you were checking references on		
11	Mr. Guo after the agreement was over with?		
12	A. Yes. We had trusted him up until that		
13	time.		
14	Q. Sure.		
15	MR. SCHMIDT: Let's not make any		
16	commentary.		
17	MR. GRENDI: That's fine.		
18	Q. Let's go with the next exhibit.		
19	(Wallop Exhibit 6, Document entitled		
20	"Time to Get Them Beginning the		
21	Psycho-Political Campaign For China", marked		
22	for identification.)		
23	Q. Ms. Wallop, do you recognize this		
24	document?		
25	A. Yes, this is one of Mike's documents.		

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1	Q. It's called "Time to Get Them."	1 presented?
2	Do you know how that title was reached,	2 A. Well, it would have been one of the
3	created?	3 four -- I mean all four of us. It would have
4	A. Yes, yes.	4 been Lianchao, Guo, myself and Mike.
5	Q. How's that?	5 Q. Okay. Do you remember where that --
6	A. It came as a result of conversations	6 A. And possibly Yvette.
7	with Guo, Lianchao and Mike and myself regarding	7 Q. Okay.
8	the -- regarding the communists working within	8 A. I don't remember.
9	The United States, from China DRC, as well as	9 Q. And do you remember where that was?
10	elsewhere.	10 A. In his flat, in his apartment at the
11	Q. So in the chronology of meetings we've	11 Sherry-Netherlands.
12	been talking about, was this document created	12 Q. Okay.
13	before the first meeting, the second meeting, the	13 A. All meetings were there with him.
14	third meeting? When did it --	14 Q. That's helpful. So you never met with
15	A. Oh, it had to have been after the	15 Mr. Guo in Washington, D.C.?
16	second or third meeting, because there's this	16 A. No.
17	photograph of Anita here.	17 Q. Okay. Let's look at 387. It says,
18	Q. And that's on SVUS387? If you look at	18 "build and operate a secret system for
19	the bottom right-hand corner --	19 micro-targeted intelligence collection and
20	A. Correct.	20 analysis." Do you see that?
21	Q. -- that's where those --	21 A. Yes.
22	A. Or maybe that's Yvette. I'm not sure.	22 Q. Is that a service that Strategic Vision
23	No, I think it is Anita.	23 would provide or someone else?
24	Q. Okay. Was this a PowerPoint	24 A. Through Mike and his teams, and some of
25	presentation?	25 my people, yes.
Page 75		Page 77
1	A. Yes.	1 Q. What do you mean by your people?
2	Q. And was it presented as a PowerPoint on	2 A. Some of my channels, as we discussed
3	a computer or did you print it out? How was	3 earlier.
4	it --	4 Q. I see. So in terms of this service,
5	A. It might have been on a USB key.	5 the game plan was for Dr. Waller to do most of
6	Q. And did you participate in creating	6 the research, is that fair to say, through his
7	this document or did Mr. -- Dr. Waller create it	7 channels?
8	himself?	8 A. I would say it was equal.
9	A. Dr. Waller did much of it. I worked	9 Q. Okay.
10	with him on some of it; not all of it, but some	10 A. It depends. I mean, it depended on
11	of it.	11 which target we were working with.
12	Q. So you made edits or --	12 Q. So I have some understanding of what
13	A. Yes.	13 Dr. Waller's process and capabilities were from
14	Q. And when was this presented to -- well,	14 his deposition. I want to know what -- what it
15	let's start with striking that.	15 is that you personally would provide as a service
16	Who was this presented to?	16 in connection with micro-targeted intelligence,
17	A. Well, this would have been presented to	17 collection and analysis?
18	Guo.	18 A. It depended on which target and which
19	Q. Anyone else?	19 channels we both used collectively to bring the
20	A. And probably Lianchao. And, obviously,	20 information together on individuals or documents.
21	myself. I can't remember if Yvette was in there	21 Q. Right. And I'm trying to understand
22	or not. He often didn't want her in the room,	22 what --
23	so, who knows.	23 A. I don't --
24	Q. I understand. But you don't recall	24 Q. -- process --
25	specifically who was in the room when this was	25 A. I can't answer that.

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<p style="text-align: right;">Page 78</p> <p>1 Q. Well, I didn't even ask a question. So    2 I want you to just wait for me to ask, and then    3 you can answer.</p> <p>4 A. Go ahead.</p> <p>5 Q. Yes, thank you. So I want to    6 understand what part of the process you would    7 participate in. What would you do to help in the    8 collection process or accessing of the channels    9 process?</p> <p>10 A. Collection and gathering. It was like    11 hunting and gathering. We both did it.</p> <p>12 Q. And what would you do in connection    13 with this engagement? What was it that you would    14 do?</p> <p>15 A. We would collect --</p> <p>16 Q. You.</p> <p>17 A. -- through my channels.</p> <p>18 Q. Right.</p> <p>19 A. Him through his channels.</p> <p>20 Q. And what channels did you access in    21 connection with this engagement?</p> <p>22 MR. SCHMIDT: Just to -- objection for    23 a second here. This is a 30(b)(6).</p> <p>24 THE WITNESS: I don't understand the    25 question.</p>	<p style="text-align: right;">Page 80</p> <p>1 you did, Strategic Vision, to collect    2 information?</p> <p>3 MR. SCHMIDT: Objection. She's talked    4 about going out and getting Mike Waller and    5 putting that together --</p> <p>6 MR. GRENDI: I'm asking about anything    7 else.</p> <p>8 MR. SCHMIDT: Okay, anything else.</p> <p>9 A. Collecting teams. Collecting teams.</p> <p>10 Q. Let's do it this way. Setting aside    11 what Mr. Waller and his teams did. Was there any    12 other teams accessed to provide information in    13 connection with this investigatory research?</p> <p>14 A. Yes.</p> <p>15 Q. And who were they?</p> <p>16 A. There were some from the U.K., there    17 were some from Israel, there were some from the    18 Middle East, there were some from our networks.</p> <p>19 Q. And now I'm talking about you    20 personally.</p> <p>21 A. Yes.</p> <p>22 Q. Are these people that you personally    23 contacted?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. That's all I'm trying to</p>
<p style="text-align: right;">Page 79</p> <p>1 MR. SCHMIDT: So you're saying you as    2 Strategic Vision, or are you saying you    3 French Wallop? How do you want to do it?</p> <p>4 MR. GRENDI: Let's do Strategic Vision.</p> <p>5 MR. SCHMIDT: Yeah. I mean, that's    6 really the question here.</p> <p>7 MR. GRENDI: That's fine.</p> <p>8 THE WITNESS: Okay.</p> <p>9 Q. What did Strategic Vision do in terms    10 of collection and analysis?</p> <p>11 A. That's what we did, we did collection    12 and analysis.</p> <p>13 Q. So there's no more specificity --</p> <p>14 A. Through our own sources.</p> <p>15 Q. -- to it than that? What does that    16 mean?</p> <p>17 A. How do you put a legal case together?</p> <p>18 You have to start with bits and pieces. So    19 that's what we were doing. We were each    20 collecting bits and pieces to make the cases.</p> <p>21 Q. Let me ask it this way. Did you ask    22 people in your network, do you know who Anita    23 Suen is? What do you know about her?</p> <p>24 A. No.</p> <p>25 Q. So I'm trying to understand what it is</p>	<p style="text-align: right;">Page 81</p> <p>1 understand. Without naming any names, would that    2 involve calling people on the phone or emailing    3 them?</p> <p>4 A. Rarely. It's face-to-face.</p> <p>5 MR. SCHMIDT: Just listen to the    6 question. Don't be distracted by the    7 document for now.</p> <p>8 Q. And so, in connection with the research    9 in this matter, how many face-to-face meetings    10 did you have with people in your contacts? I'm    11 talking about you, Ms. Wallop.</p> <p>12 MR. SCHMIDT: Objection.</p> <p>13 A. I have no idea. Many.</p> <p>14 Q. You said you rarely do telephone calls.    15 Did you do some in connection with this research    16 agreement?</p> <p>17 A. No.</p> <p>18 Q. What about internet research, did you    19 do any internet research in connection with this?</p> <p>20 MR. SCHMIDT: Objection. Her    21 personally?</p> <p>22 Q. Strategic Vision. Did Strategic Vision    23 do any internet research in connection with this    24 research?</p> <p>25 A. Lightly. That was not our -- that was</p>

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<p style="text-align: right;">Page 82</p> <p>1 not our way of doing it.</p> <p>2 Q. And what about you personally?</p> <p>3 A. No.</p> <p>4 Q. It says in this document that the first</p> <p>5 ten targets are identified, do you see that?</p> <p>6 A. What page?</p> <p>7 Q. 387.</p> <p>8 A. Yes.</p> <p>9 Q. What did you understand that to mean?</p> <p>10 A. Well, Guo gave us -- Miles Guo gave us</p> <p>11 a large packet of names, and, in that -- in the</p> <p>12 first ten, which they upped it to 15 in the first</p> <p>13 month, but the first ten targets were identified,</p> <p>14 and then they changed their mind and asked for 15</p> <p>15 for the first month. So that's -- those were his</p> <p>16 targets.</p> <p>17 Q. So these ten targets, are those</p> <p>18 referred to as fish in the signed research</p> <p>19 agreement?</p> <p>20 A. Correct.</p> <p>21 Q. And it says, "monitor the ten targets</p> <p>22 for several months to understand their habits,</p> <p>23 patterns, personal and professional networks,</p> <p>24 businesses and corruption." Do you see that?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. When Guo threw that whole document down</p> <p>2 on the coffee table in his apartment and he said,</p> <p>3 these are the people I want investigated, these</p> <p>4 are -- I said, where did this list come from?</p> <p>5 And he said, I paid \$250 million for this list.</p> <p>6 I said, wow, okay. So that's when I knew who the</p> <p>7 first ten targets were.</p> <p>8 MR. GRENDI: Let's do Exhibit 7.</p> <p>9 (Wallop Exhibit 7, Document entitled</p> <p>10 "1: Anita Yiu Suen", marked for</p> <p>11 identification.)</p> <p>12 Q. Do you recognize what's been marked as</p> <p>13 Wallop 7?</p> <p>14 A. Correct, I do.</p> <p>15 Q. And is this the document that you just</p> <p>16 said Mr. Guo threw down on the table?</p> <p>17 A. It looks like it.</p> <p>18 Q. Okay. So, to your recollection,</p> <p>19 Mr. Guo threw a paper copy of this document onto</p> <p>20 a table at some point during a meeting?</p> <p>21 A. No, on -- onto his coffee table in his</p> <p>22 sun room, yes.</p> <p>23 Q. When was that?</p> <p>24 A. During the -- probably the second or</p> <p>25 third meeting we had with him in New York, in</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. Who would do that work of monitoring?</p> <p>2 A. Our team.</p> <p>3 Q. And by our team, what encompasses the</p> <p>4 Strategic Vision team for this research</p> <p>5 agreement?</p> <p>6 MR. SCHMIDT: Objection. Go ahead.</p> <p>7 A. The particular team, we called it Team</p> <p>8 1, and that's what they were assigned to do.</p> <p>9 Q. So Team 1 was assigned the monitoring</p> <p>10 of the ten targets referred to here?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. And do you know the name of</p> <p>13 anyone on Team 1?</p> <p>14 A. No.</p> <p>15 Q. Do you know the leader of Team 1, the</p> <p>16 name of the leader of Team 1?</p> <p>17 A. I know his acronym. I don't know his</p> <p>18 name, his full name. This was through Mike.</p> <p>19 Q. So you don't know the full name of the</p> <p>20 leader of Team 1?</p> <p>21 MR. SCHMIDT: Yes or no, if you know.</p> <p>22 Q. I'm asking a yes or no.</p> <p>23 A. No.</p> <p>24 Q. So, specifically, do you know when the</p> <p>25 first ten targets were identified?</p>	<p style="text-align: right;">Page 85</p> <p>1 December of 2017.</p> <p>2 Q. So did you keep that paper copy that</p> <p>3 was thrown on the table?</p> <p>4 A. Well, I had this copy, I mean, the copy</p> <p>5 of the copy. I mean, the original that he gave</p> <p>6 us.</p> <p>7 Q. I see. So you retained a paper copy of</p> <p>8 what's been marked as Wallop 7?</p> <p>9 A. That's correct.</p> <p>10 Q. And was that -- that was before the</p> <p>11 contract was signed, right, the research</p> <p>12 agreement that's the subject of this action?</p> <p>13 A. No. I think we -- I saw the document,</p> <p>14 but we didn't get the full document because of</p> <p>15 the famous flash drives that were corrupted --</p> <p>16 Q. Right, but --</p> <p>17 A. -- by Yvette.</p> <p>18 Q. -- I just want to understand what</p> <p>19 happened to the paper version that was --</p> <p>20 A. Oh, I didn't -- he didn't give that to</p> <p>21 us at the time. He kept his copy.</p> <p>22 Q. You didn't receive --</p> <p>23 A. No, no, no --</p> <p>24 Q. -- a paper copy from him?</p> <p>25 A. -- no, no, no. He just showed it to</p>

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1 us.	1 A. I don't remember. I don't know
2 Q. I see.	2 precisely.
3 A. He threw his copy down on the table.	3 Q. Okay. And you don't remember
4 Q. And this was at the second or third	4 discussing whether -- what the political weapon
5 meeting?	5 would be?
6 A. Yeah.	6 A. Well, a political weapon, which is what
7 Q. Okay.	7 Guo wanted to use towards his investigation of
8 A. Yes.	8 these individuals. He was going to use it
9 Q. And you did not retain a copy from that	9 against them, for whatever purpose.
10 meeting?	10 Q. But you don't know the purpose?
11 A. No.	11 A. Not entirely.
12 Q. And did you go through the paper copy	12 Q. Okay. A couple of bullets down it
13 that was on the table?	13 says, "Break the Party's control of corrupt
14 A. With him?	14 information" -- or "corruption information" I
15 Q. Yes. Or on your own.	15 should say. Do you see that?
16 A. Well, we glanced at it. Mike was	16 A. Yes.
17 there. We glanced at it to try to get an idea as	17 Q. What is "the Party's control"? Which
18 to who it was, what it was.	18 party are we talking about there?
19 Q. We'll come back to this. Going back to	19 A. Talking about the communist party.
20 Exhibit 6. On 387, it says, "Document everything	20 Q. And what control of corruption
21 as leverage to gain concessions, protect people,	21 information does the communist party have?
22 use as political weapon, or as aid in criminal	22 A. Well, Guo had said that the CCP, or the
23 prosecution and asset recovery."	23 communist party of China, there was a great deal
24 Do you see that, it's the fourth or	24 of corruption within the leadership, and, as a
25 fifth bullet down?	25 result of that, he wanted to find as much
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1 A. I don't have it.	1 corruption as possible, and he wanted us to
2 Q. Oh, I'm sorry.	2 investigate and retrieve that kind of corruption.
3 A. So, what page?	3 In other words, funds that would have been taken
4 Q. The same one we've been looking at,	4 out of the country illegally, cash payments, all
5 387.	5 of these things that were part of that.
6 A. So what would you like to look at?	6 Q. I understand. And so going to the next
7 Q. Where it says, "Document everything as	7 page, 388. It says, "Reduce political threats to
8 leverage to gain concessions, protect people, use	8 yourself and your cause."
9 as political weapon, or as aid in criminal	9 What did you understand is the
10 prosecution and asset recovery"?	10 political threats to whoever yourself or your
11 A. Correct.	11 cause is there?
12 Q. What is the -- what was that about;	12 A. That was to Guo.
13 what does that mean in terms of the services to	13 Q. Okay.
14 be provided?	14 A. Political threats to Guo and Guo's
15 A. This was what Mike was referring to	15 cause.
16 with regard to the Team 1.	16 Q. And what were those political threats?
17 Q. So Team 1 was going to?	17 A. Well, he said that they were monetary
18 A. Take a look at that, yes.	18 and political, and that many people were after
19 Q. And what kind of leverage was sought?	19 him either for monetary damages or corruption,
20 A. I guess, criminal leverage, depending	20 both by the Chinese officials as well as,
21 upon the individuals that we were investigating,	21 perhaps, his own corruption issues. I don't
22 per Guo's instructions.	22 know.
23 Q. It also says "protect people." What	23 Q. Did you look into that at all in terms
24 was -- to your mind, what was the -- what was	24 of --
25 that about?	25 A. This was a preliminary -- this was a

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<p style="text-align: right;">Page 90</p> <p>1 preliminary document that Mike had put together;    2 so, no, we were not under contract to look into    3 it.</p> <p>4 Q. Okay. So you didn't do any work    5 regarding Mr. Guo or his business prior to --</p> <p>6 A. The contract?</p> <p>7 Q. -- the execution of the contract on or    8 about January 6, 2018?</p> <p>9 A. No.</p> <p>10 Q. You didn't access your network to    11 determine whether this was someone you wanted to    12 do business with or not?</p> <p>13 A. We had Bill Gertz, who was one of the    14 finest intellects on Chinese corruption, and    15 reporters, journalists, and also Lianchao, again,    16 of the highest sterling standards. When they    17 asked us to look into it, that's what we did.    18 That was looking into putting together a program    19 that would help somebody that we believed at the    20 time was absolutely anti-communist.</p> <p>21 Q. I see. So you relied up -- let me put    22 it this way. Strategic Vision relied upon the    23 recommendation of Bill Gertz and Lianchao Han in    24 terms of deciding to do business with, or    25 deciding to enter into the research agreement?</p>	<p style="text-align: right;">Page 92</p> <p>1 with Russian opposition and Chinese expats?    2 A. Through me and certain ideas that we    3 had to combine our ideological belief in    4 democracy.</p> <p>5 Q. And -- right. How would those ideas be    6 executed, what sort of --</p> <p>7 A. Through dialogue.</p> <p>8 Q. -- activities?</p> <p>9 A. Through dialogue.</p> <p>10 Q. And you also have links with Chinese    11 people inside Russia?</p> <p>12 A. We would have, yes.</p> <p>13 Q. That's you and Mr. Waller?</p> <p>14 A. Yes.</p> <p>15 Q. It says, "for propaganda and    16 organizational purposes." Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. What would be the propaganda and    19 organizational purposes?</p> <p>20 A. Media and social media, probably.</p> <p>21 Q. So, in other words, messaging of    22 anti-communist, pro-democracy rhetoric?</p> <p>23 A. Correct.</p> <p>24 Q. Would the Russian opposition group be    25 involved in collecting investigatory research or</p>
<p style="text-align: right;">Page 91</p> <p>1 A. Correct.</p> <p>2 Q. Let's just go to SVUS390.</p> <p>3 A. Um-hum.</p> <p>4 Q. It says, "Network With Russian    5 Opposition and Chinese Expats." Do you see that?</p> <p>6 A. Correct.</p> <p>7 Q. Is this a service that you would    8 provide or Mr. Waller would provide?</p> <p>9 A. Both of us did.</p> <p>10 Q. Okay. And why was Strategic Vision    11 recommending that Mr. Guo network with Russian    12 opposition and Chinese expats?</p> <p>13 A. Well, the photograph that you have    14 here, that's in this is Mikhail Khodorkovsky.    15 Okay? Mikhail Khodorkovsky is a client of mine,    16 and he is an anti-Putin and pro-democracy leader,    17 opposition leader for Russia; so, therefore, we    18 felt that this might be a good person for Guo to    19 essentially team up with on certain ideological    20 issues.</p> <p>21 Q. And how would that synergy or    22 collaboration work?</p> <p>23 A. Through me.</p> <p>24 Q. Right. But just a little more    25 specificity. How would Mr. Guo, or whoever, team</p>	<p style="text-align: right;">Page 93</p> <p>1 is that a separate group?</p> <p>2 A. It would be separate.</p> <p>3 Q. Let's go to 394. It says, "Target    4 Intelligence Capability: Cost."</p> <p>5 These costs here, are these prices that    6 Strategic Vision quoted?</p> <p>7 A. In a preliminary discussion, yes.</p> <p>8 Q. Okay. So, initially, Strategic Vision    9 was offering \$2,805,000 to have two teams monitor    10 one person?</p> <p>11 A. Yes.</p> <p>12 Q. And what would that monitoring entail,    13 just in terms of the types of surveillance or    14 investigatory work?</p> <p>15 A. It was hugely complex, and --</p> <p>16 MR. SCHMIDT: Keep going.</p> <p>17 A. It was hugely complex, and it had to do    18 with all the investigative tentacles that we    19 could reach within our channels.</p> <p>20 Q. So is that the full package of services    21 that Strategic Vision could provide in terms of    22 monitoring, that's like the full suite, call it    23 that?</p> <p>24 A. Except that he didn't accept it.</p> <p>25 Q. I understand that. But was this --</p>

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<p>1 Q. It says, "sign MOU." That's a  2 memorandum of understanding?</p> <p>3 A. That's correct.</p> <p>4 Q. Is that how Strategic Vision normally  5 contracts with its clients?</p> <p>6 A. Again, this is a preliminary overview.  7 This was a discussion. We were discussing it  8 openly in a little meeting that we were having  9 with Mr. Guo. So this was just sort of a menu of  10 deciding what we would do and how we would  11 perform.</p> <p>12 Q. Does Strategic Vision normally sign  13 written agreements with its clients?</p> <p>14 A. Yes.</p> <p>15 Q. Does Strategic Vision have a standard  16 contract that it uses for its client engagements?</p> <p>17 A. No.</p> <p>18 Q. So you don't have a stock agreement  19 that you normally use when --</p> <p>20 A. No client's the same.</p> <p>21 Q. So, prior to signing the research  22 agreement, did you tell Mr. Guo that you had an  23 in-house team of investigators at Strategic  24 Vision?</p> <p>25 A. This is a fascinating misnomer.</p>	<p>1 Q. What, if anything, did you tell Mr. Guo  2 about an Abu Dhabi princess?</p> <p>3 A. A Saudi -- it was not Abu Dhabi, it was  4 Saudi.</p> <p>5 Q. Okay. What did you --</p> <p>6 A. To clarify, it's usual we have to  7 clarify.</p> <p>8 Q. Sure. What did you tell Mr. Guo about  9 a Saudi princess?</p> <p>10 A. She was my roommate.</p> <p>11 Q. That was in college?</p> <p>12 A. No, in high school.</p> <p>13 Q. And is she a client of Strategic  14 Vision?</p> <p>15 A. No.</p> <p>16 Q. Okay. Did you tell Mr. Guo that you  17 had, or that Strategic Vision had relationships  18 with clients in Saudi Arabia?</p> <p>19 A. Yes.</p> <p>20 Q. And in Iran?</p> <p>21 A. Many years ago, in Iran.</p> <p>22 Q. What about Turkey?</p> <p>23 A. Not a client. A relationship.</p> <p>24 Q. And what about Qatar, did you tell him  25 you had clients in Qatar?</p>
<p>1 Q. What -- what term is that that you're  2 calling --</p> <p>3 A. No.</p> <p>4 Q. -- a misnomer?</p> <p>5 A. No.</p> <p>6 MR. SCHMIDT: Just answer the question.</p> <p>7 A. No.</p> <p>8 MR. SCHMIDT: Let him follow -- he'll  9 follow up if he wants to follow up.</p> <p>10 Q. Okay. So Strategic Vision does not  11 have an in-house team of investigators?</p> <p>12 A. No.</p> <p>13 Q. And you never told Mr. Guo that you had  14 20 employees, did you?</p> <p>15 A. I said that we worked with a team of  16 people. I did not say that we had 20 employees.</p> <p>17 Q. Okay. Did you ever tell him that you  18 had strong teams in Europe and the Middle East?</p> <p>19 A. Most likely, yes.</p> <p>20 Q. Again, this is all before signing the  21 research agreement, right?</p> <p>22 A. Yes.</p> <p>23 Q. And did you tell him you had  24 relationships with an Abu Dhabi princess?</p> <p>25 A. I said a -- no.</p>	<p>1 A. I did. Past tense. We don't work with  2 terrorists.</p> <p>3 Q. Okay. What about Republican  4 politicians, did you ever tell Mr. Guo that you  5 worked for Republican politicians?</p> <p>6 A. Many.</p> <p>7 Q. So you told him you had -- that  8 Strategic Vision had worked for --</p> <p>9 MR. SCHMIDT: Just focus in on what you  10 told him.</p> <p>11 A. Yes. I did, yes.</p> <p>12 Q. So you told Mr. Guo that you had  13 provided services to -- that Strategic Vision had  14 provided services to Republican --</p> <p>15 A. Personally.</p> <p>16 Q. -- politicians?</p> <p>17 A. Personally. Not Strategic Vision.</p> <p>18 Q. Okay. And what did that entail; that  19 was political campaigns or --</p> <p>20 A. Political campaigns.</p> <p>21 Q. And I'm going to guess those were  22 Republican --</p> <p>23 A. Republican.</p> <p>24 Q. -- politicians?</p> <p>25 A. Yes, presidential.</p>

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1 Q. Which president, or nominee?		1 Q. I'm just trying to --
2 A. Beginning -- it's okay, it's on the		2 A. There were a lot of drafts running
3 record. Beginning with the campaign for		3 around at the time, so, and the date is not
4 President Reagan, President Bush, Dan Quayle,		4 right.
5 obviously President Trump.		5 Q. When did you first start drafting an
6 Q. Did you tell Mr. Guo about all of these		6 agreement in connection with this case?
7 or some of them?		7 A. When he asked us to, probably in --
8 A. Yes.		8 around the 15th or so of December of 2017, after
9 Q. Okay.		9 several meetings.
10 A. He asked.		10 Q. Were there any other meetings, other
11 Q. Did you tell him that you had influence		11 than the three we've talked about already, that
12 at the CIA?		12 preceded this drafting?
13 MR. SCHMIDT: Objection, but go ahead.		13 A. You know, you'd have to ask Mike. I
14 A. I never would have used the word		14 don't think so, no.
15 influence.		15 Q. When did you -- when did you do the
16 Q. How would you put it?		16 first draft? Don't even worry about this
17 A. Channels.		17 document. I don't know if it is the first draft.
18 Q. In other words, you have contacts at		18 A. When we had the vision documents, those
19 the CIA?		19 were sort of the beginning of the discussion.
20 A. Yes.		20 This time to get them was also part of the vision
21 Q. And you could get information from them		21 document that was on the flash drive, and it was
22 that could be useful to a client from the CIA?		22 all in the conversation of trying to understand
23 A. No. That's a trick question.		23 what it was that Guo wanted.
24 Q. No, I'm not trying to trick you. I		24 Q. So how did you go about doing the first
25 didn't -- if it came out that way, it wasn't my		25 draft? Did you and Mike sit down at a computer
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1 intent.		1 together, or what was the process?
2 A. Yeah, come on.		2 A. Yes.
3 Q. I'm trying to understand what your		3 Q. Okay. Where was that, at your home in
4 channels to the CIA, what their use is?		4 Virginia?
5 A. Information sources that are		5 A. Yes.
6 unclassified.		6 Q. And you sat together and --
7 Q. And I would ask you the same question.		7 A. Yes.
8 Did you tell him that you had contacts or		8 Q. -- typed it out or --
9 channels in the state department?		9 A. Sat together and discussed it and...
10 A. Yes.		10 Q. Did you -- was it handwritten notes
11 Q. Did you ever tell him that you worked		11 that you later had someone transcribe or did
12 for the CIA?		12 you --
13 A. Never.		13 A. No.
14 Q. Okay. Did you ever tell him that		14 Q. -- type it on the computer?
15 Mr. Waller worked for the CIA?		15 A. No. We just typed it up while we were
16 A. Never.		16 talking.
17 MR. GRENDI: Let's go to 8.		17 Q. And did you do the typing or did he?
18 (Wallop Exhibit 8, Research Agreement,		18 A. He did the typing.
19 January 1, 2018, marked for identification.)		19 Q. Okay. And did you keep the original
20 Q. This has been marked Wallop 8. Do you		20 draft that you created?
21 recognize this document at all?		21 A. I think this was the draft. I don't
22 A. This was a draft document to -- to Guo		22 know.
23 initially.		23 Q. Okay. And do you recall giving Wallop
24 Q. Who created it?		24 8 to Mr. Guo or Lianchao or Ms. Wang?
25 A. I think Mike and I did.		25 A. I'm sure that we gave it to both of

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<p>1        A.    We just had an agreement of trust  2    between us.</p> <p>3        Q.    What were the terms of that agreement?</p> <p>4        A.    Probably 50/50, plus expenses.</p> <p>5        Q.    And I take it this wasn't a written  6    agreement?</p> <p>7        A.    No.    We never needed one.</p> <p>8        Q.    Right.    So when did you and -- well,  9    when did Strategic Vision and Mr. Waller come to  10   this 50/50 split agreement?</p> <p>11       A.    Well, after we had the agreement  12   finally signed, it had been going off and on, off  13   and on during all of December, we didn't know  14   whether we had an agreement or not.    And then,  15   when Yvette turned up with the first set of flash  16   drives that were corrupted, so then I had come to  17   New York -- we didn't have an agreement, per se.  18   We had a signed agreement.    We had no funds at  19   the time, at the first -- at the tail end of  20   December, when we were still all talking after  21   Christmas.</p> <p>22       And, finally, the funds turned up --  23   I'm trying to answer your question here.    When  24   the funds turned up in, like, the 2nd or 3rd of  25   January of 2018, we still didn't know whether</p>	<p>1    the wire that was sent?</p> <p>2       A.    The wire was not sent until the middle  3    of January or so.</p> <p>4       Q.    Okay.    And was that wire for splitting  5    the profits or for something else?</p> <p>6       A.    It was for beginning to start paying  7    the team as well as beginning to pay Mike.</p> <p>8       Q.    Oh, so it was both?</p> <p>9       A.    Yeah.    There were two wires.    Maybe  10   there were three wires, yeah.</p> <p>11       Q.    So how much was the wire for the team?</p> <p>12   And I assume that means Team 1?</p> <p>13       A.    The preliminary amount for Team 1 was  14   at least 300,000.</p> <p>15       Q.    And how much of that, if there was a  16   second wire or the same wire, was for Dr. Waller?</p> <p>17       A.    Then there was a separate wire for  18   about 200 for Dr. Waller.    It could have been  19   250, I have to look.    We haven't done our tax  20   thing yet on it.    But about 250.    And then there  21   was an additional amount for expenses.</p> <p>22       Q.    How much was that expense amount wire,  23   if you recall?</p> <p>24       A.    Well, I think -- we're talking about  25   travel, and -- because he had to do a lot of the</p>
<p>1        that was even going to work, and then they turned  2    up from somebody we'd never heard of, and so  3    forth and so on.    So we had to sit down and  4    decide what was going to go for the teams that we  5    were going to use and how we were going to  6    allocate the expenses and so forth.</p> <p>7       Q.    So when -- when was the point in time  8    when Strategic Vision and Mr. Waller decided how  9    they were going to, as you described it, split  10   the -- split it 50/50?</p> <p>11       A.    Not until sometime in January.  12   Probably the end of January.</p> <p>13       Q.    So, well after the contract had been  14   signed --</p> <p>15       A.    Yes.</p> <p>16       Q.    -- and the --</p> <p>17       A.    We were trying to figure out what  18   things were going to cost.</p> <p>19       Q.    You said before that Strategic Vision  20   had sent money to Mr. Waller, or Dr. Waller?</p> <p>21       A.    When?</p> <p>22       Q.    I'm asking.    That's what my question  23   is.</p> <p>24       A.    No.    I mean...</p> <p>25       Q.    You said there was a wire.    What was</p>	<p>1        face-to-face collection, and last minute, which  2    costs a lot more; probably between 25 and 50, I  3    can't remember, thousand.</p> <p>4       Q.    And is that the full extent of the  5    amount of money that's been paid to Dr. Waller in  6    connection with the research agreement that's the  7    subject of this litigation?</p> <p>8       A.    I think there was a bit more, maybe  9    another 50, and that was based on certain  10   invoices that he had for -- for things that he  11   was -- that we had to pay.</p> <p>12       Q.    I see.    And so what about -- let's just  13   set aside Dr. Waller.    Were there any other costs  14   that Strategic Vision incurred in connection with  15   this research agreement that didn't go through  16   Dr. Waller or one of his entities?</p> <p>17       A.    There were -- there was a lot of travel  18   expense for Strategic Vision, face-to-face time  19   with these individuals overseas that I had to do.  20   There was -- there were other entities that were  21   also contracted to retrieve information.</p> <p>22       Q.    Let's go one at a time, I'm sorry to  23   hop in.    But what were your -- what were  24   Strategic Vision's kind of direct travel  25   expenses?</p>

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<p style="text-align: right;">Page 118</p> <p>1       A.    Oh, I would say probably at least  2    50,000.</p> <p>3       Q.    And does Strategic Vision have records  4    and bank statements that would memorialize or  5    otherwise reflect all these payments you're  6    talking about here today?</p> <p>7       A.    We would be able to give you an idea as  8    to what the costs are, yes.</p> <p>9       Q.    So those records do exist?</p> <p>10      A.    The records, the receipts, yes.</p> <p>11     (*r)    MR. GRENDI: Joe, obviously we're going  12    to call for the production of those  13    documents, we'll obviously send you a  14    letter, but to put that on the record.</p> <p>15      Q.    I'm sorry, you were saying after travel  16    expenses, there were other costs as well?</p> <p>17      A.    Yes.</p> <p>18      Q.    What were those?</p> <p>19      A.    The hiring of individuals overseas to  20    retrieve certain information that was only --  21    only in the U.K. or in Switzerland or in the  22    Middle East.</p> <p>23      Q.    Okay. And these are -- this is  24    separate from Team 1?</p> <p>25      A.    Yes.</p>	<p style="text-align: right;">Page 120</p> <p>1    travel, time spent working on this, lots of  2    different meetings with different people to try  3    to collect data.</p> <p>4       Q.    Did Strategic Vision ever turn away any  5    clients because of this engagement?</p> <p>6       A.    Yes, we did.</p> <p>7       Q.    When was that?</p> <p>8       A.    It was probably in March.</p> <p>9       Q.    Of what year?</p> <p>10      A.    I'm sorry.</p> <p>11      Q.    That's okay.</p> <p>12      A.    2018.</p> <p>13      Q.    Sure. March of 2018. And why did  14    Strategic Vision turn that client away?</p> <p>15      A.    Because we were still working on this,  16    we believed. It could have been February, too.</p> <p>17      I'd have to ask Mike.</p> <p>18      Q.    And what's the name of that potential  19    client?</p> <p>20      A.    I can't tell you.</p> <p>21      Q.    So you're refusing to tell me that  22    because?</p> <p>23      A.    I can't tell you.</p> <p>24      Q.    No, I'm asking why you're not telling  25    me?</p>
<p style="text-align: right;">Page 119</p> <p>1       Q.    And what was the cost of, let's just  2    say, the team you used to get information out of  3    the U.K.?</p> <p>4       A.    It was about 20,000 U.S. dollars.</p> <p>5       Q.    Is that a group called Fletcher?</p> <p>6       A.    That's correct.</p> <p>7       Q.    Okay. What about, you said that maybe  8    a team in Switzerland or somewhere else?</p> <p>9       A.    Yes.</p> <p>10      Q.    What was the cost of that other team?</p> <p>11      A.    I'd have to look. I can't remember.</p> <p>12      But it was minimal. I mean, it wasn't -- it  13    wasn't -- it's like maybe 8, \$10,000, something  14    like that.</p> <p>15      Q.    Right.</p> <p>16      A.    Some of it had to be done in cash.</p> <p>17      Q.    How much of it was done in cash?</p> <p>18      A.    Maybe that amount.</p> <p>19      Q.    Eight to 10,000?</p> <p>20      A.    Eight to 10,000, perhaps. I hate cash.</p> <p>21      Q.    If you would take a moment, are there  22    any other costs that you can think of that  23    Strategic Vision incurred because of this  24    research agreement?</p> <p>25      A.    Well, the usual costs, telephone,</p>	<p style="text-align: right;">Page 121</p> <p>1       A.    It's confidential.</p> <p>2       MR. SCHMIDT: Can you describe in  3    general terms at all or?</p> <p>4       THE WITNESS: Obviously, I cannot.</p> <p>5       MR. SCHMIDT: Okay.</p> <p>6       MR. GRENDI: I mean, obviously, we  7    don't accept that assertion of  8    confidentiality here, and we'll deal with it  9    at a later date.</p> <p>10      Q.    So why was it that this confidential  11    client couldn't be engaged?</p> <p>12      A.    We had a lot on our plate.</p> <p>13      Q.    And how much was this potential client  14    willing to engage Strategic Vision for?</p> <p>15      A.    We hadn't gotten that far.</p> <p>16      Q.    So you don't know whether the --</p> <p>17      A.    No.</p> <p>18      Q.    -- potential client was going to be a  19    valuable one or not?</p> <p>20      A.    No, I don't know. I'd have to -- I'd  21    have to talk to Mike about it.</p> <p>22      Q.    Was it Mike's client or your client, or  23    Strategic Vision's client I should say?</p> <p>24      A.    We would have shared the client.</p> <p>25      Q.    Okay. And just generally, can you</p>

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<p style="text-align: right;">Page 126</p> <p>1                   MR. GRENDI: So another 15 minutes.  2                   Let's do Strategic Vision 9.  3                   (Wallop Exhibit 9, Research Agreement  4                   dated December 29, 2017, marked for  5                   identification.)  6                   Q. Ms. Wallop, do you recognize this  7                   document?  8                   A. I do.  9                   Q. That's your signature on the last page  10                   there?  11                   A. It is.  12                   Q. Were you physically present when this  13                   contract was executed?  14                   A. Yes.  15                   Q. And who else was there?  16                   A. Yvette Wang.  17                   Q. Anyone else?  18                   A. No.  19                   Q. Dr. Waller wasn't physically present?  20                   A. No.  21                   Q. Was he on a conference call or  22                   telephoned in during the time that this agreement  23                   was signed?  24                   A. No.  25                   Q. The agreement references the laws of</p>	<p style="text-align: right;">Page 128</p> <p>1                   as to how best to visualize, so to speak, the  2                   whole concept of this agreement, we used an  3                   example of like, it's like fish in a tank. So if  4                   you put the ten fish, or, as it turned out to be,  5                   15 fish in the tank, and one of the fish --  6                   forgive me -- died, but we didn't want to use the  7                   word died, if one of the fish wasn't a useful  8                   fish on the information that we were trying to  9                   pull, we would take that fish out and put a new  10                   fish, meaning a new name, into the tank, and we  11                   would run the investigative background on that  12                   new fish, as well as the other nine fish.  13                   So, that's where the whole concept of  14                   the fish tank came from. He loved it. He  15                   couldn't wait to use it. It was a big deal to  16                   him. So, fine, we kept talking about fish. So,  17                   for whatever reason, that's why it ended up in  18                   this sort of contract agreement.  19                   I realize that it's not the usual kind  20                   of contract terminology that I would have used,  21                   but he loved it, and so we used it, and so he  22                   understood it, and that's why we moved forward  23                   with it  24                   Q. I just want to know where the concept  25                   came from. Did he start using the term fish or</p>
<p style="text-align: right;">Page 127</p> <p>1                   the state of Nevada in that second paragraph, do  2                   you see that?  3                   A. Correct.  4                   Q. Where did that come from?  5                   A. Because Strategic Vision is registered  6                   in the state of Nevada.  7                   Q. So you put that in there because that's  8                   where Strategic Vision is incorporated?  9                   A. Correct.  10                   Q. And there's some, I'll call it lingo or  11                   jargon in this contract about fish, do you recall  12                   that?  13                   A. Yes.  14                   Q. Where did the term fish come from?  15                   A. Guo was having a hard time  16                   understanding how -- how we would select the --  17                   the concept of investigation and the numbers, for  18                   instance, per month. The -- the whole file that  19                   he showed us had -- the original file, whatever  20                   exhibit that was, in fact, had at least 92 names  21                   in it, which was reduced down to 30 names, which  22                   was then reduced down to the ten names, but then  23                   they switched and wanted to have 15 names in the  24                   first month.  25                   So, in order to give him an explanation</p>	<p style="text-align: right;">Page 129</p> <p>1                   did you; kind of like you saw a fish tank and you  2                   said, well, it's just like if you took fish in  3                   and out of a tank?  4                   A. Well, we were talking in hypotheticals.  5                   He didn't understand how we would have to just  6                   take different names out of different sort of  7                   collection points --  8                   Q. I see.  9                   A. -- so we just used a really simple  10                   analogy of a fish tank. And you put the ten fish  11                   in, as it turned out for the first month 15, and  12                   then they -- you know, you pull one out if you  13                   found that it wasn't going anywhere; in other  14                   words, if it was a dead end. A lot of these  15                   Chinese names used fake names. That's a whole  16                   other thing we can get into.  17                   Q. Sure. And has Strategic Vision ever  18                   used this fish, or fish tank terminology --  19                   A. Never.  20                   Q. -- in connection with --  21                   Just let me finish my question.  22                   A. Sorry.  23                   Q. -- with any other client?  24                   A. Never.  25                   Q. I take it from your expression that you</p>

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<p>1    found it silly or ridiculous?</p> <p>2       A.    I did, but it helped him understand the</p> <p>3       concept.</p> <p>4       Q.    It says here that, "Any and all</p> <p>5       materials provided by the client, that's Eastern</p> <p>6       Profit, to the contractor, that's Strategic</p> <p>7       Vision, will be treated with absolute</p> <p>8       confidentiality and will not be shared by the</p> <p>9       contractor with any other entity."</p> <p>10       Do you see that in the third paragraph</p> <p>11       of this research agreement?</p> <p>12       A.    Yes.</p> <p>13       Q.    What -- how does that work with</p> <p>14       Strategic Vision in terms of sharing information</p> <p>15       with other entities?</p> <p>16       A.    Well, we had to share it with the</p> <p>17       teams, in other words, for them to be able to do</p> <p>18       the research.</p> <p>19       Q.    Does the contract discuss that at all?</p> <p>20       A.    It's very clear. You can't have an</p> <p>21       agreement -- you can't do the research unless you</p> <p>22       give it to the teams to do the research, right?</p> <p>23       Q.    I just asked you if that was in the</p> <p>24       agreement?</p> <p>25       A.    Yes.</p>	<p>1       high quality original research and prepare</p> <p>2       reports on subjects chosen at the client's</p> <p>3       discretion."</p> <p>4       Do you see that in that following</p> <p>5       sentence?</p> <p>6       A.    Correct, yes.</p> <p>7       Q.    What original research did Strategic</p> <p>8       Vision do in connection with this contract?</p> <p>9       A.    Based upon what we received, we then</p> <p>10       started diving into pulling information.</p> <p>11       Q.    When you say we, are you talking about</p> <p>12       the entity Strategic Vision or other people, like</p> <p>13       teams?</p> <p>14       A.    Teams, and Mike and myself.</p> <p>15       Q.    Was there anyone else that did the</p> <p>16       research, other than those three entities that</p> <p>17       you just referred to, yourself, Mr. Waller, or</p> <p>18       Dr. Waller, and the teams?</p> <p>19       A.    The groups in -- the individual ones in</p> <p>20       both Europe and in the U.K.</p> <p>21       Q.    Is that, you mean Fletcher --</p> <p>22       A.    Yes.</p> <p>23       Q.    -- and the other entity that you</p> <p>24       referred to --</p> <p>25       A.    Yes.</p>
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<p>1       Q.    Where?</p> <p>2       A.    With any other entity. "Will not be</p> <p>3       shared by any other entity." It's not an empty,</p> <p>4       it was a team. An entity would be the Washington</p> <p>5       Post, or you, or a third or fourth party that has</p> <p>6       nothing to do with this research agreement.</p> <p>7       Q.    So I just want to understand that. So</p> <p>8       then, the contractor referred to in the contract</p> <p>9       refers to more than just Strategic Vision?</p> <p>10       A.    Our teams.</p> <p>11       Q.    Okay.</p> <p>12       A.    You understand the teams that we had to</p> <p>13       use.</p> <p>14       Q.    I'm just trying to understand what the</p> <p>15       contract says. Does the contract say anything</p> <p>16       about teams?</p> <p>17       A.    Well, if you're in the business, you</p> <p>18       understand teams are teams, and you have to use a</p> <p>19       team with a -- as a part of the contract. He</p> <p>20       knew perfectly well what that meant.</p> <p>21       Q.    I just asked you whether the contract</p> <p>22       said it, that's all.</p> <p>23       A.    I'm not a lawyer. It wasn't drawn up</p> <p>24       by a lawyer.</p> <p>25       Q.    It says, "The contractor will conduct</p>	<p>1       Q.    -- I guess, in Switzerland?</p> <p>2       A.    Yes.</p> <p>3       Q.    It says, "The contractor will produce</p> <p>4       complete research reports and provide all</p> <p>5       supporting data as indicated below." Do you see</p> <p>6       that, two or three sentences down?</p> <p>7       A.    Yes.</p> <p>8       Q.    So was Strategic Vision going to</p> <p>9       produce all the reports or were the teams going</p> <p>10       to create some of them?</p> <p>11       A.    The teams were going to develop them on</p> <p>12       the flash drives. We were not going to do any</p> <p>13       written reports.</p> <p>14       Q.    Why wouldn't you do any -- why wouldn't</p> <p>15       Strategic Vision do any written reports?</p> <p>16       A.    Because we were trying to keep it as</p> <p>17       secure as possible.</p> <p>18       Q.    But you understood that the other</p> <p>19       teams -- strike that. Let me start over.</p> <p>20       Strategic Vision understood that its teams would</p> <p>21       create written reports?</p> <p>22       MR. SCHMIDT: Objection.</p> <p>23       A.    No.</p> <p>24       Q.    No?</p> <p>25       A.    No, it never says anything here about a</p>

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<p>1       written report.</p> <p>2       Q.     No, I know, I understand that. I'm  3       trying to understand whether Strategic Vision  4       understood whether its teams or independent  5       contractors would produce written reports?</p> <p>6       A.     We would not produce written reports,  7       or we had no intention of doing that. This  8       was -- these were face-to-face meetings,  9       face-to-face information, USB flash drives.</p> <p>10      Q.     Oh, I understand.</p> <p>11      A.     It was --</p> <p>12      Q.     Maybe we're having a semantic --</p> <p>13      A.     It was Guo's -- sorry. It was Guo's  14       insistence on the security measure.</p> <p>15      Q.     I want to clarify something here. Do  16       you understand written to mean just like  17       something written on a piece of paper as opposed  18       to electronic?</p> <p>19      MR. SCHMIDT: That's how I understood  20       it.</p> <p>21      A.     Yes.</p> <p>22      MR. SCHMIDT: That's how the question  23       was. You went from flash drives to USBs --</p> <p>24      MR. GRENDI: No, hold on. Hold on.</p> <p>25      MR. SCHMIDT: -- into written reports.</p>	<p style="text-align: right;">Page 134</p> <p>1       confused. I don't know what you're asking.</p> <p>2       MR. GRENDI: All right. I mean --</p> <p>3       MR. SCHMIDT: I think you got to back  4       way up and start this over.</p> <p>5       MR. GRENDI: Well, we're getting -- why  6       don't we do lunch. We'll start over on  7       this. It's no big deal.</p> <p>8       THE VIDEOGRAPHER: Off the record at  9       12:57.</p> <p>10      (Whereupon, a short recess was taken.)</p> <p>11      THE VIDEOGRAPHER: Back on the record  12       at 1:01.</p> <p>13      Q.     How did Strategic Vision intend to  14       deliver the reports described in this research  15       agreement?</p> <p>16      A.     Directly to the designated driver, the  17       designated agent for Mr. Guo, who was either  18       going to be Lianchao, then it became Yvette, and  19       then it became Lianchao again. So we would give  20       it to them or Guo directly on a USB key.</p> <p>21      Q.     So there would be electronic documents  22       on a USB?</p> <p>23      A.     Correct.</p> <p>24      Q.     And would any of those documents be a  25       report in narrative form?</p>
<p>1       So a written report is a written report. It  2       has a standard connotation. So you might  3       have to redo this.</p> <p>4       MR. GRENDI: Yeah, let's -- let's break  5       it out. I didn't get it. I always think of  6       writing as both.</p> <p>7       Q.     So, including electronic documents, did  8       you understand that written materials would be  9       produced?</p> <p>10      A.     No.</p> <p>11      Q.     So you never -- Strategic Vision never  12       contemplated providing any written materials to  13       Eastern Profit?</p> <p>14      A.     Correct.</p> <p>15      Q.     So Strategic Vision understood  16       everything would be conveyed orally to the  17       client?</p> <p>18      A.     Via flash drive.</p> <p>19      Q.     So flash drive would be allowed.</p> <p>20      That's -- I'm including a flash drive as a  21       writing. In other words, if something is typed  22       or handwritten on a piece of paper, that's a  23       writing. Can we agree on that?</p> <p>24      A.     No.</p> <p>25      MR. SCHMIDT: I'm actually seriously</p>	<p style="text-align: right;">Page 135</p> <p>1       A.     I never saw them until later, until  2       after all of this started. I never saw any of  3       the documentation. Again, compartmentalizing.</p> <p>4       Q.     Right. So Strategic Vision never  5       reviewed any of the documents that were delivered  6       to either Lianchao Han or Yvette Wang under this  7       research agreement?</p> <p>8       MR. SCHMIDT: Objection. Go ahead.</p> <p>9       A.     No.</p> <p>10      Q.     And I'll just ask about you personally.  11       You personally didn't review any of the documents  12       that were delivered to Lianchao Han or Yvette  13       Wang under this research agreement?</p> <p>14      A.     No, because of the timing and the  15       logistics.</p> <p>16      Q.     Okay. What is financial forensic  17       historical research?</p> <p>18      A.     What do you mean?</p> <p>19      Q.     Well, it's described here in -- on  20       Eastern 5, on the first page there?</p> <p>21      A.     Yes.</p> <p>22      Q.     Have you used that term before in --</p> <p>23      A.     Yes.</p> <p>24      Q.     -- other research agreements?</p> <p>25      A.     Yes.</p>

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<p>1 Q. And are these kind of standard terms or  2 items that would be included in financial  3 forensic historical research?</p> <p>4 A. It would be, particularly if you're  5 looking at information you're trying to get in  6 the way of money laundering or cash purchases;  7 for instance, there were cash purchases of  8 houses, cash purchases by these fish. We were  9 tracking their individual financial spending  10 habits, how they could have a house, how they  11 could have a car, when they only had \$2,500 in a  12 credit card limit.</p> <p>13 I mean, there were multiple layers and  14 levels of investigation that go on into  15 financial, forensic accounting, or research in  16 this case.</p> <p>17 Q. This kind of list of different things  18 that could be researched, including statements,  19 capital sources, etc., do you see that list with  20 all those commas there?</p> <p>21 A. Yes.</p> <p>22 Q. Was that a list that you and Dr. Waller  23 put together in terms of Strategic Vision's  24 capabilities?</p> <p>25 A. What we would have been able to have</p>	<p>1 to our detriment; we said, it was not legal to do  2 what he wanted to be done, so.</p> <p>3 Q. So in terms of the -- you understood  4 that the client wanted everything in terms of  5 financial forensic historical research?</p> <p>6 A. That's correct.</p> <p>7 Q. And then you kind of put together this  8 list here of everything you could think of that  9 you could access?</p> <p>10 A. We put together the list first.</p> <p>11 Q. Okay.</p> <p>12 A. And then he kept saying he wanted more  13 and more and more and more.</p> <p>14 Q. Oh, so do you recall adding, you know,  15 different items to this A tab, forensic  16 historical research, to include more items that  17 he was demanding?</p> <p>18 A. No. He demanded it verbally.</p> <p>19 Q. Okay.</p> <p>20 A. I think it was around the 26th of  21 January, that, I do remember, where he was  22 insistent; I don't care what it takes, get it,  23 get it. We said, you have to take your time.</p> <p>24 Q. And it talks about on the next page,  25 Eastern 6, progress reports. It says,</p>
<p>1 researched -- there are two ways of looking at  2 it. Stateside, what anybody can do that is into  3 this field.</p> <p>4 Q. Right.</p> <p>5 A. Versus what you can also do overseas,  6 and they're sort of two different rabbits here.</p> <p>7 Q. Does the agreement kind of break out  8 that difference in terms of U.S. versus foreign?</p> <p>9 A. Somewhere in here, I think it might  10 have.</p> <p>11 Q. Okay. But just going back to this list  12 of different types of information on Eastern 5.  13 Do you recall you and Dr. Waller putting that  14 list together, or this --</p> <p>15 A. Yes, we did. We talked about it, and  16 he wrote -- wrote it while we collaborated on it.</p> <p>17 Q. Do you remember any input from the  18 other side as to what the financial forensic  19 historical research should include?</p> <p>20 A. They wanted everything, everything we  21 could get our hands on.</p> <p>22 Q. I see.</p> <p>23 A. He was particularly -- Guo was  24 particularly insistent that we dive and dive  25 harder, and dive faster, and dive harder, almost</p>	<p>1 Page 139  2 "contractor will produce a progress report on" --</p> <p>3 A. Where is this?</p> <p>4 Q. It's the, I guess, the first full  5 paragraph on Eastern 6.</p> <p>5 A. Oh, okay.</p> <p>6 Q. What is a progress report?</p> <p>7 A. Verbal conversations that we had with  8 him.</p> <p>9 Q. What would be in a verbal progress  10 report?</p> <p>11 A. Telling him what we were doing and how  12 we were trying to get the teams set up and done  13 in the first month.</p> <p>14 Q. Has Strategic Vision bargained for  15 progress reports in other agreements with other  16 clients?</p> <p>17 A. I don't understand the question. Each  18 client is different and each agreement is  19 different, and so the terms are different.</p> <p>20 Q. So you've never -- strike that. Has  21 Strategic Vision ever provided progress reports  22 to other clients in connection with investigatory  23 research?</p> <p>24 A. Usually we do it the same way, through  25 USB key or face-to-face.</p>

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<p style="text-align: right;">Page 142</p> <p>1 Q. Has the term progress report been used    2 by Strategic Vision in other contracts it has    3 with its clients?</p> <p>4 A. It depends on the terms of the    5 contract.</p> <p>6 Q. I'm asking if you recall?</p> <p>7 A. I don't recall.</p> <p>8 Q. So progress reports are not a standard    9 term that Strategic Vision uses in other research    10 agreements?</p> <p>11 MR. SCHMIDT: Objection.</p> <p>12 A. Progress reports have different    13 definitions depending upon the security and    14 the -- each individual client's situation. They    15 are not all the same.</p> <p>16 Q. I understand.</p> <p>17 A. So they're not all the same.</p> <p>18 Q. Okay.</p> <p>19 A. A progress report -- if somebody wants    20 a progress report on how their cat is doing, we    21 can do a progress report on how the cat is, or    22 how a house is, or a real estate is. But this is    23 highly confidential and a secure confidential    24 compartmentalization of information that was    25 vital to him, to Guo.</p>	<p style="text-align: right;">Page 144</p> <p>1 a progress report and a preliminary report?</p> <p>2 A. I have no idea how to answer that,    3 except that I'm trying to explain to you that it    4 is, in fact, a face-to-face conversation. It is    5 not in writing.</p> <p>6 Q. I understand that.</p> <p>7 A. Okay. So what's the problem on the    8 question? I don't understand.</p> <p>9 Q. I want to understand what the    10 difference is between them.</p> <p>11 A. A written report and a verbal report?</p> <p>12 Q. Not a written report, no. Let me ask    13 my question. It says, a weekly progress    14 report --</p> <p>15 A. Yes.</p> <p>16 Q. -- and one preliminary report at the    17 end of the first month, or in the first month.</p> <p>18 A. All right.</p> <p>19 Q. And I want to know if, to Strategic    20 Vision, is there a difference between the    21 contents of a progress report and a preliminary    22 report. I'm talking about contents, not delivery    23 method.</p> <p>24 A. Depending upon how much we've been able    25 to gather, the preliminary report is precisely</p>
<p style="text-align: right;">Page 143</p> <p>1 Q. What about preliminary reports?</p> <p>2 A. There is no terminology on here on    3 preliminary reports, other than face-to-face.    4 That's what we were relying on, was face-to-face.</p> <p>5 Q. If you look at the next sentence, it    6 says -- or, actually, the same sentence. It    7 says, "the contractor will produce a progress    8 report on this financial, forensic research each    9 week in the first month." Then it says, "one    10 preliminary report in the first month."</p> <p>11 A. Which we did. We exceeded that.</p> <p>12 Q. Let me ask you this. What does a    13 preliminary report include?</p> <p>14 A. Verbal report, face-to-face, which is    15 what we were doing when we had the meetings with    16 Guo in his apartment.</p> <p>17 Q. I think you're misunderstanding my    18 question. I'm trying to understand what the    19 contents of a preliminary report would be, as    20 compared to a progress report?</p> <p>21 A. It would be a verbal report and    22 updating him on what the circumstances were and    23 what we were gathering and how we were gathering    24 it. That's a preliminary report.</p> <p>25 Q. So there's really no difference between</p>	<p style="text-align: right;">Page 145</p> <p>1 that; that's just the beginning, that's like the    2 first paragraph in a novel. The next    3 conversation, which is what happened, the next    4 conversation was an update on the material and    5 the information that we had already gathered. So    6 it was all still verbal, face-to-face. There is    7 no written report.</p> <p>8 Q. And what about a historical research    9 report, one comprehensive historical research    10 report; what were the contents --</p> <p>11 A. And that was --</p> <p>12 Q. -- whether it's conveyed orally or in    13 writing or electronically, what would the    14 contents of a comprehensive historical research    15 report be?</p> <p>16 A. That would have been the findings that    17 would have been coming from our teams, or team in    18 this case, which would have been the USB or flash    19 drive.</p> <p>20 Q. And what would typically be in a    21 comprehensive historical research report? What    22 kind of level of information would be there?</p> <p>23 A. Since we were trying to get something    24 within ten days of the contract commencing, and    25 he was adamant about getting something</p>

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<p style="text-align: right;">Page 150</p> <p>1        A.    It was all done with Team 1. Team 1  2    was doing it.</p> <p>3        Q.    So Team 1 was assigned the A, B and C  4    described here on Eastern 5 and 6?</p> <p>5        A.    They were assigned the entire menu.  6    That was their job. Even though it was separated  7    out, they knew exactly what their mandate was.</p> <p>8        Q.    And the social media research reports,  9    again, is there any distinction between how  10   they're created and the other reports,  11   conceptually?</p> <p>12       A.    We didn't have time. We -- what we  13   were pulling in ten days was remarkable. Nobody  14   can pull it in ten days. So you have a  15   three-month contract that you're signed on to,  16   and you believe that you've got three months to  17   pull the entire set of information retrieval  18   that's necessary, and you're given ten days,  19   while somebody's squawking about, oh, my, you  20   know, it -- it's not all there.</p> <p>21           Well, it can't possibly be all there.  22   Nobody can have it there in ten days. You can't  23   build a team, collect the beginnings of all of  24   these things, unless you want to be shut down  25   immediately.</p>	<p style="text-align: right;">Page 152</p> <p>1    context?</p> <p>2        A.    All the information we were mandated to  3    investigate.</p> <p>4        Q.    And why USB only; was that a Strategic  5    Vision concept or Mr. Guo or someone else?</p> <p>6        A.    It was Guo, as well as our own sense of  7    security on this investigation. We were  8   investigating, according to Guo, a number of the  9   communist Chinese hierarchy leadership and their  10   children in the United States, and it was --  11   could have been life-threatening for all of us.  12   So it was only on USB key, and, hence, the  13   security issue.</p> <p>14       Q.    Did Strategic Vision understand that  15   all the fish in Exhibit 7 were living in the U.S.  16   or had property in the U.S.?</p> <p>17       A.    Some of -- no. Some of them did and  18   some of them didn't. I -- you know, you'd have  19   to go through them individually to see which ones  20   have what.</p> <p>21       Q.    And so is that why Strategic Vision  22   needed a U.S. team, because there was  23   U.S.-located fish?</p> <p>24       A.    There was U.S.-located information,  25   like fake passport numbers, fake Social Security</p>
<p style="text-align: right;">Page 151</p> <p>1        Q.    I just want to be clear, though. Did  2    Strategic Vision deliver any social media  3   research reports?</p> <p>4        A.    I'm sure we did, somewhere.</p> <p>5        Q.    Did you verbally deliver a social media  6   research report to the client?</p> <p>7        A.    I believe we did.</p> <p>8        Q.    When would that have been?</p> <p>9        A.    Sometime during -- between December and  10   January of 2017, '18. They were verbally,  11   verbally. And we may have had some  12   documentation. I can't remember.</p> <p>13       Q.    And what about current tracking  14   research, how was that conveyed to Ms. Wang or  15   Lianchao Han?</p> <p>16       A.    Mike did it with the USB key.</p> <p>17       Q.    And that was on January 30th of 2018?</p> <p>18       A.    Yes.</p> <p>19       Q.    Any other time?</p> <p>20       A.    Yes, there was another USB key earlier,  21   I think.</p> <p>22       Q.    It says on Eastern 7 that "all  23   deliverables shall be by USB drive only."</p> <p>24       A.    Correct.</p> <p>25       Q.    What does deliverables mean in that</p>	<p style="text-align: right;">Page 153</p> <p>1    numbers, fake names, Chinese, fake. A lot of  2    fakes.</p> <p>3        Q.    In the United States?</p> <p>4        A.    In the United States. On the list that  5    Guo gave us.</p> <p>6        Q.    It says on Eastern 7 that, "the  7    contractor guarantees that all information  8    provided is genuine." Do you see that?</p> <p>9        A.    Yes.</p> <p>10       Q.    It's in the criteria section.</p> <p>11       A.    Sure.</p> <p>12       Q.    How does Strategic Vision guarantee  13   that its information is genuine?</p> <p>14       A.    Based upon the individuals from whom we  15    were retrieving the information, providing of  16    course we were given -- not given fake names and  17    fake passports and fake criteria to investigate.</p> <p>18       Q.    I just want to understand Strategic  19    Vision's process, though. How does it normally  20   go about guaranteeing the genuineness of the  21   information being provided to its clients?</p> <p>22       A.    Because we trust our sources, and our  23    sources do not make up nonsense.</p> <p>24       Q.    Does Strategic Vision ever do any  25    cross-checking or verification of the information</p>

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<p>1 provided by its sources?</p> <p>2 A. That's part of the idea that we had</p> <p>3 with having Team 1 and Team 2.</p> <p>4 Q. That's what you're talking about with</p> <p>5 the -- how to get them document?</p> <p>6 A. Yeah. It's cross-checking, it's making</p> <p>7 sure, double verifying the same fact. You have a</p> <p>8 birthday over here and you have a birthday over</p> <p>9 there. They should be the same birthday. If</p> <p>10 they're not, there's something that we need to</p> <p>11 look at on a secondary basis.</p> <p>12 If you have a passport number over</p> <p>13 here, a U.S. passport, a U.S. visa number over</p> <p>14 here, and it doesn't match what we have within</p> <p>15 the state department, there's an issue. So we</p> <p>16 have to then go down that rabbit hole.</p> <p>17 Q. And that's a synthesis or an analysis</p> <p>18 process that Strategic Vision typically does with</p> <p>19 the information it's getting from its sources?</p> <p>20 A. That's correct.</p> <p>21 Q. I see. And that's how Strategic Vision</p> <p>22 typically feels comfortable guaranteeing that all</p> <p>23 the information is genuine?</p> <p>24 A. That's correct.</p> <p>25 Q. Did Strategic Vision have an</p>	<p style="text-align: right;">Page 154</p> <p>1 your sort of date of birth, and we turn around</p> <p>2 and we find out really your name is Joe Schmidt,</p> <p>3 and you were born in a totally different place,</p> <p>4 then we have to then rejig the entire system that</p> <p>5 we're working with.</p> <p>6 That's why it was extremely -- not</p> <p>7 just -- it wasn't just frustrating, but it was an</p> <p>8 extremely complex situation that you couldn't</p> <p>9 just do like you're checking somebody's credit</p> <p>10 report or Better Business Bureau thing. You just</p> <p>11 couldn't.</p> <p>12 Q. Well, just going back to Wallop 7.</p> <p>13 A. Whatever that is.</p> <p>14 Q. You're saying that -- that's the list</p> <p>15 of fish?</p> <p>16 A. Yes.</p> <p>17 Q. You could take a look back at it if you</p> <p>18 want, but I don't think it's necessary.</p> <p>19 A. No. I sort of know these fish by now.</p> <p>20 Q. I was going to say, so how many of the</p> <p>21 fish were -- was Strategic Vision provided with</p> <p>22 correct information for?</p> <p>23 A. Well, I can tell you, you can see some</p> <p>24 of my notes on here. Some of these -- for</p> <p>25 instance, on page 3, you have Anita.</p>
<p>1 opportunity to verify that the information being</p> <p>2 provided was genuine in this instance?</p> <p>3 A. Yes and no.</p> <p>4 Q. Okay. How does that work; which part</p> <p>5 is yes and which part is no?</p> <p>6 A. Okay. Of course. Yes, we could verify</p> <p>7 in many cases that the information was correct,</p> <p>8 and then, if we found that it was incorrect, we</p> <p>9 would have to, like, double-check it.</p> <p>10 Q. No, I'm asking about what happened in</p> <p>11 this instance, with this research agreement. Was</p> <p>12 Strategic Vision able to determine that the</p> <p>13 information being provided back to the client was</p> <p>14 genuine?</p> <p>15 A. Yes.</p> <p>16 MR. SCHMIDT: Objection, but go ahead.</p> <p>17 A. Yes.</p> <p>18 Q. How did Strategic Vision do that?</p> <p>19 A. Because we compared apples and oranges</p> <p>20 and made sure that they were one and the same, as</p> <p>21 far as information that we were turning over</p> <p>22 based on -- you have to understand, if we're told</p> <p>23 your name is John Smith, and we're given</p> <p>24 information on these documents from Guo that your</p> <p>25 name is John Smith, with a photograph and all of</p>	<p style="text-align: right;">Page 155</p> <p>1 Q. Yes.</p> <p>2 A. Her real mother is Mingduan Yao. Her</p> <p>3 adoptive parents, because that's done a lot in</p> <p>4 this basket, are Frank Suen, and then -- then</p> <p>5 the -- the mother -- sorry, the mother is</p> <p>6 Mingduan Yao, and then the father of the sister,</p> <p>7 Mingshan -- Mingshan Yao. These are the real</p> <p>8 parents of this girl, okay? But, in certain</p> <p>9 documentation, it's showing that these people</p> <p>10 are, in fact, her mother and father (indicating).</p> <p>11 They're not. They're her adopt -- adoptive</p> <p>12 parents.</p> <p>13 Then if you go to here, if you go on to</p> <p>14 page 4, and it shows 1990 as her, I guess, entry,</p> <p>15 because I don't have the note on here; 1990 is</p> <p>16 her -- maybe her entry into the United States</p> <p>17 visa. The Social Security number, if I recall</p> <p>18 correctly, and this is only on recall --</p> <p>19 Q. Sure.</p> <p>20 A. -- was, in fact -- here we go, on page</p> <p>21 5, it shows it, had the same Social Security</p> <p>22 number as a woman named Eileen Rodriguez, at the</p> <p>23 same address where this woman Anita was living.</p> <p>24 So then again, this is just one tidbit</p> <p>25 of one fish, or one person that you have to start</p>

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<p style="text-align: right;">Page 158</p> <p>1 tracking, and you have to understand where the    2 pieces fit, or why.</p> <p>3 Q. And so just --</p> <p>4 A. If you go -- yeah.</p> <p>5 Q. On that fifth page, those are your    6 notes about --</p> <p>7 A. Yes.</p> <p>8 Q. -- Eileen Rodriguez?</p> <p>9 A. Yes.</p> <p>10 Q. And what does --</p> <p>11 A. It's the same Social Security number.</p> <p>12 Q. And what's the money down there? It    13 looks like it says 2,000 and --</p> <p>14 A. No, no. It's 2 million. 2.089.000.</p> <p>15 That, I believe, was the address where she was    16 living, and it showed, if I recall correctly,    17 again, I can't remember because I don't have it    18 all in front of me, but she had sort of a credit    19 limit of \$2,000 on a credit card, the only credit    20 card she had, and then the house that she was    21 living in somehow was bought in cash, but it    22 doesn't show who the owners were of that    23 residence.</p> <p>24 And then you get all these -- you must    25 have had four or five Social Security numbers</p>	<p style="text-align: right;">Page 160</p> <p>1 of whack, like numbers, passport numbers or visa    2 numbers, or this one has an Australian    3 nationality, some of the ones that we were doing    4 in the U.K. had totally different names, but then    5 they actually did match up if you dug deeper.</p> <p>6 Q. Okay. So some of them had -- you had    7 mentioned earlier had -- were completely fake,    8 they weren't --</p> <p>9 A. That's right.</p> <p>10 Q. -- real people?</p> <p>11 A. That's right.</p> <p>12 Q. How many of the 15 fish were, in    13 Strategic Vision's opinion or knowledge, fake?</p> <p>14 A. I would have to talk to Mike about    15 that, but I think we -- we came up with at least    16 five or six that were fake, or at least had a lot    17 of questions to be asked about them. The names    18 did not match up with the names on the state    19 department visas or on -- within our channels.</p> <p>20 Q. In other words, there obviously was a    21 person who looked like that fish in the --</p> <p>22 A. That's right.</p> <p>23 Q. -- document?</p> <p>24 A. Yes.</p> <p>25 Q. But that the names and information</p>
<p style="text-align: right;">Page 159</p> <p>1 that were the same Social Security numbers for    2 the same person.</p> <p>3 Q. So just going back to my original    4 question, if you recall, how many of the    5 information about the -- well, strike that.</p> <p>6 A. There were a lot. There were at least    7 three or four.</p> <p>8 Q. There were 15 fish, right?</p> <p>9 MR. SCHMIDT: Let him finish the    10 question.</p> <p>11 Q. Yeah, let me just finish the question.    12 Thanks.</p> <p>13 There were 15 fish, correct?</p> <p>14 A. Yes, initially.</p> <p>15 Q. And how many of them had information    16 that, in Strategic Vision's knowledge, is false    17 or inaccurate?</p> <p>18 A. I would say maybe six or seven. Maybe    19 more.</p> <p>20 Q. And the remainder had, let's call it    21 accurate information?</p> <p>22 A. I wouldn't call it accurate. It had to    23 be double-checked.</p> <p>24 Q. Sure.</p> <p>25 A. So we found little things that were out</p>	<p style="text-align: right;">Page 161</p> <p>1 being provided were for --</p> <p>2 A. Were fake.</p> <p>3 Q. Were fake?</p> <p>4 A. If -- if Guo was telling the truth    5 about saying he paid \$250 million for this    6 information, then he totally got, excuse me,    7 screwed. He got totally screwed. Because the    8 information in here, just from what we were able    9 to surmise, was rubbish, and that's real -- the    10 real garbage.</p> <p>11 Q. Okay. Let's go back to the research    12 agreement, that's Wallop 9.</p> <p>13 A. Yes, let's go.</p> <p>14 Q. And we'll -- I do want to check on    15 lunch. I know it's 1:30 now. Let me just go see    16 about that. Let's go off the record for a    17 second.</p> <p>18 A. Do you want to finish this?</p> <p>19 Q. Well --</p> <p>20 A. I'd rather finish this.</p> <p>21 Q. Let's keep going, sure. I'm sure    22 they'll knock when the time comes.</p> <p>23 A. I'm sure they will.</p> <p>24 Q. Let's talk about irregular    25 circumstances. Do you see that paragraph?</p>

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<p>1        A.    Yes.</p> <p>2        Q.    Did you and Mr. Waller draft this</p> <p>3        section?</p> <p>4        A.    Dr. Waller, yes, we did.</p> <p>5        Q.    And what was the intent or purpose</p> <p>6        behind drafting this section?</p> <p>7        A.    I wouldn't call it intent. That's --</p> <p>8        that's truly not fair. It was a protective</p> <p>9        element for life. You can't always say that it's</p> <p>10       going to be 100 percent of everything every</p> <p>11       second of every day. You cannot. It's not</p> <p>12       there, it's not gonna happen.</p> <p>13           So irregular circumstances by us, and</p> <p>14        including Guo, said that both parties understand</p> <p>15        that occasional unforeseen challenges may arise</p> <p>16        that will slow or block comprehensive research,</p> <p>17        and that there may be periods in which</p> <p>18        information is irregular, unavailable or</p> <p>19        incomplete.</p> <p>20           Perfect reference are some of these</p> <p>21        names in here. The contractor will endeavor to</p> <p>22        make all research and reports as complete as</p> <p>23        possible in a timely scheduled manner. Which</p> <p>24        does not mean ten days from the beginning of the</p> <p>25        contract.</p>	<p style="text-align: right;">Page 162</p> <p>1        unavailable for a time; is that fair to say?</p> <p>2        A.    Which Guo understood completely. At</p> <p>3        least he said he did.</p> <p>4        Q.    When did he tell you that?</p> <p>5        A.    Several times. I think it was probably</p> <p>6        the middle of January when we met him, and then</p> <p>7        on the 26th, even though he was upset we didn't</p> <p>8        have everything by Chinese New Year, or some kind</p> <p>9        of new criteria.</p> <p>10       Q.    Did you understand that the research</p> <p>11        was needed in a very tight schedule because of</p> <p>12        the Chinese New Year?</p> <p>13       A.    No.</p> <p>14       Q.    When did you come to understand that?</p> <p>15       A.    Later, when we realized that that</p> <p>16        seemed to be his issue.</p> <p>17       Q.    When did you first talk about getting</p> <p>18        the information by Chinese New Year with Mr. Guo</p> <p>19        or Yvette Wang --</p> <p>20       A.    Never.</p> <p>21       Q.    -- or Lianchao?</p> <p>22       A.    Never. Not until much later, I mean,</p> <p>23        after the fact.</p> <p>24       Q.    No, that's what I'm trying to find out</p> <p>25        when --</p>
<p>1        Q.    Has Strategic Vision ever used a clause</p> <p>2        that's substantially the same or similar to this</p> <p>3        irregular circumstances clause in other</p> <p>4        agreements?</p> <p>5        A.    I'm sure there have been ones that have</p> <p>6        been similar to it. I mean, it's not unusual.</p> <p>7        This is -- this is the form that is taken.</p> <p>8        Q.    In terms of Strategic Vision's</p> <p>9        experience in this field, was the research</p> <p>10       bargained for in this research agreement, did it</p> <p>11       encounter irregular circumstances or problems</p> <p>12       from the outset?</p> <p>13       A.    I would say when we started getting</p> <p>14        into it, we found that there were irregularities.</p> <p>15       That's not to say that we couldn't continue</p> <p>16        digging to find the answer. But we certainly</p> <p>17        found irregularities when we were talking to Team</p> <p>18        2 in Texas about these people.</p> <p>19        Q.    Right. So just in terms of, any</p> <p>20        project has some problems, no investigatory</p> <p>21        research project just goes off without a hitch,</p> <p>22        correct?</p> <p>23        A.    Correct.</p> <p>24        Q.    So there's always some issues that</p> <p>25        either slow down the research or make information</p>	<p style="text-align: right;">Page 163</p> <p>1        A.    Oh.</p> <p>2        Q.    When that was.</p> <p>3        A.    After the fact, so sometime in the</p> <p>4        early part of February, I guess. I think maybe</p> <p>5        Lianchao sort of said that to us.</p> <p>6        Q.    Okay. But prior to the contract, there</p> <p>7        was no discussion about --</p> <p>8        A.    No.</p> <p>9        Q.    -- Chinese New Year or anything like</p> <p>10       that?</p> <p>11       A.    No.</p> <p>12       Q.    If irregular circumstances arise, does</p> <p>13        the client have to pay for not receiving any</p> <p>14        research?</p> <p>15       A.    Of course. It's the risk we both take.</p> <p>16        Q.    And has that occurred in the past with</p> <p>17        Strategic Vision's clients?</p> <p>18        A.    Yes.</p> <p>19        Q.    So even though Strategic Vision is</p> <p>20        unable to provide, let's just say, any research</p> <p>21        because of an irregular circumstance, the client</p> <p>22        still has to pay the full price of the reports?</p> <p>23        A.    It's our time that it takes to do what</p> <p>24        we're doing. We wouldn't find it out, would we,</p> <p>25        unless we had done the investigation. So it's</p>

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<p style="text-align: right;">Page 166</p> <p>1 our time.</p> <p>2 Q. But if the compensation is monthly, and</p> <p>3 time-based, essentially, is there any period</p> <p>4 where irregular circumstances would result in a</p> <p>5 pause of the client's obligation to make payment?</p> <p>6 MR. SCHMIDT: Objection. It's been</p> <p>7 answered, but go ahead.</p> <p>8 A. I'd like to ask any law firm. Give me</p> <p>9 a break.</p> <p>10 Q. Well, I'm asking you the question,</p> <p>11 though, so, please.</p> <p>12 A. Well, you can ask the question, but I'm</p> <p>13 telling you, it's just like a law firm, we</p> <p>14 operate in the same way.</p> <p>15 MR. SCHMIDT: That's the answer. You</p> <p>16 got your answer.</p> <p>17 MR. GRENDI: I'm gonna just clean it</p> <p>18 up. Thank you.</p> <p>19 Q. So, in your mind, or in Strategic</p> <p>20 Vision's understanding, it's compensated for the</p> <p>21 time it spends trying to do research, not based</p> <p>22 upon what's actually delivered?</p> <p>23 MR. SCHMIDT: Objection.</p> <p>24 A. Yes.</p> <p>25 Q. What's the cost of a report under this</p>	<p style="text-align: right;">Page 168</p> <p>1 it is.</p> <p>2 Q. Yeah, Eastern 9 is the Bates number.</p> <p>3 A. Okay, yes.</p> <p>4 Q. Do you see where it says, "It is</p> <p>5 understood that client may direct other entities</p> <p>6 to pay the contractor"? It's in the --</p> <p>7 A. Yes.</p> <p>8 Q. What was the purpose of this clause?</p> <p>9 A. Well, it was very simple, but,</p> <p>10 apparently, Mr. Guo didn't understand how</p> <p>11 important it was.</p> <p>12 Q. Well, why was this clause inserted into</p> <p>13 the agreement; what was the meaning of it?</p> <p>14 A. Because we had told him that, and they</p> <p>15 had told us that it was coming through a William</p> <p>16 Wu in London from their account somewhere else in</p> <p>17 the U.K. or Europe, and we had told them</p> <p>18 explicitly that it should not come from Hong Kong</p> <p>19 or an Asian account; and, guess what, it did, and</p> <p>20 that was because of the mainland Chinese</p> <p>21 intelligence services then finding out who Guo</p> <p>22 and his people in Hong Kong were paying for this</p> <p>23 kind of -- for a contract, let's just put it that</p> <p>24 way.</p> <p>25 Q. So was the purpose of this clause to</p>
<p style="text-align: right;">Page 167</p> <p>1 research agreement?</p> <p>2 A. Well, you have it here. It's listed.</p> <p>3 It's complex, depending upon the menu that he</p> <p>4 chose to work with.</p> <p>5 Q. Are you looking on page -- well,</p> <p>6 Eastern 8?</p> <p>7 MR. SCHMIDT: There's a knocking on the</p> <p>8 door.</p> <p>9 THE WITNESS: Saved by your knock.</p> <p>10 MR. GRENDI: Let me see if that's it.</p> <p>11 We'll go off. I think it's about time.</p> <p>12 THE VIDEOGRAPHER: Off the record at</p> <p>13 1:42.</p> <p>14 (Whereupon a luncheon recess was</p> <p>15 taken.)</p> <p>16 THE VIDEOGRAPHER: Back on the record</p> <p>17 at 2:30.</p> <p>18 Q. Good afternoon. Ms. Wallop, you still</p> <p>19 understand that you're under oath?</p> <p>20 A. Yes.</p> <p>21 Q. On this Exhibit Number 9, on page</p> <p>22 Eastern 9.</p> <p>23 A. Just a second.</p> <p>24 Q. I think it's right in front of you.</p> <p>25 A. Oh, okay. Number 9, page 9, whatever</p>	<p style="text-align: right;">Page 169</p> <p>1 prevent the Chinese communist party from finding</p> <p>2 out about this relationship?</p> <p>3 A. Yes, for our safety and the safety of</p> <p>4 our -- our contractors or our teams.</p> <p>5 Q. Was it ever contemplated that the money</p> <p>6 would come to an entity other than Strategic</p> <p>7 Vision, to protect Strategic Vision's identity?</p> <p>8 A. Yes. It was supposed to come from a</p> <p>9 U.K. account to our account, from -- from him,</p> <p>10 from Guo, through his money manager in the U.K.,</p> <p>11 as we understood it.</p> <p>12 Q. When was that discussed?</p> <p>13 A. It was discussed when -- just before we</p> <p>14 agreed to the contract, to the terms of the</p> <p>15 contract, or the agreement. We shouldn't call it</p> <p>16 a contract, as it's an agreement.</p> <p>17 Q. And how did that issue come up; did you</p> <p>18 bring it up or was it --</p> <p>19 A. Mike and I both raised it.</p> <p>20 Q. Okay. And what was just the substance</p> <p>21 of that discussion?</p> <p>22 A. The security fact that it was dangerous</p> <p>23 for all of us to be connected with him based upon</p> <p>24 the investigation that we would be doing, and if</p> <p>25 that investigation of the mainland Chinese</p>

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<p style="text-align: right;">Page 170</p> <p>1 hierarchy and their families was disclosed as a  2 result of the funding that he was doing to us  3 directly.</p> <p>4 Q. Did you ever consider, on the recipient  5 side, using another entity to receive the money,  6 other than Strategic Vision?</p> <p>7 A. No. The agreement was with Strategic  8 Vision. We had no idea who Eastern was.</p> <p>9 Q. Let me ask you about the next sentence  10 there. It says, "all client payments must be  11 received by the contractor by wire transfer  12 within five business days of invoice," do you see  13 that?</p> <p>14 A. Yes. Somewhere.</p> <p>15 Q. It's the last sentence in that  16 paragraph.</p> <p>17 A. Yes.</p> <p>18 Q. Did Strategic Vision issue any invoices  19 to Eastern?</p> <p>20 A. We were -- no.</p> <p>21 Q. So there was never a time when  22 Strategic Vision sent an invoice document saying  23 you owe this money to us, to Strategic -- or to  24 Eastern Profit, excuse me?</p> <p>25 A. That's when Lianchao was involved, and</p>	<p style="text-align: right;">Page 172</p> <p>1 Q. Was that on January 6th, the day it was  2 signed?</p> <p>3 A. I think so.</p> <p>4 Q. And how did that come up?</p> <p>5 A. Yvette said that was who was going to  6 be signing it.</p> <p>7 Q. What did you say in response to that,  8 if anything?</p> <p>9 A. I asked her, I said, who's Eastern  10 Profit? She said, Mr. Guo's company, or some  11 such thing.</p> <p>12 Q. Then you checked where Eastern Profit  13 Corporation Limited was incorporated?</p> <p>14 A. If I recall, when we were in the  15 federal court, you didn't know where --</p> <p>16 Q. I'm asking you a question.</p> <p>17 A. No, I'm --</p> <p>18 MR. SCHMIDT: Just answer --</p> <p>19 A. I'm trying to answer it. I don't know  20 because I couldn't find anything; when we went to  21 sort of look it up, there wasn't anything that we  22 could find in this country.</p> <p>23 Q. What I'm asking is, did you look up  24 Eastern Profit Corporation Limited on January 6,  25 2018, did you try to figure out where it was from</p>
<p style="text-align: right;">Page 171</p> <p>1 he explicitly told Guo that he did owe the  2 amount. We never got paid for January, we never  3 got paid for February. We had the agreement,  4 which outlined the terms. We gave Guo the first  5 two weeks, essentially, free on our own ticket.  6 So from the 16th to the 26th was ten days that we  7 were into the contract. So if you've taken it  8 from the 16th of January to the 16th of February,  9 that's when an invoice technically should have  10 gone out to him. But we believed we were still  11 pulling information, and we wanted to be able to  12 have as much as possible for him, and, in the  13 meantime, he pulled his stunt with the lawsuit on  14 the 23rd. And I was out of the country, so I  15 didn't know anything about it.</p> <p>16 Q. So Strategic Vision never sent Eastern  17 an invoice prior to February 23rd, 2018?</p> <p>18 A. We did not, but we should have. In  19 hindsight, we thought that we were -- we thought  20 that we were being honest.</p> <p>21 Q. When was the first time Eastern Profit  22 Corporation was included in this contract, in a  23 draft of it I should say?</p> <p>24 A. It was never, until this particular  25 document, to my knowledge.</p>	<p style="text-align: right;">Page 173</p> <p>1 then?</p> <p>2 A. No.</p> <p>3 Q. Did you know it was domiciled in China?</p> <p>4 A. I had no idea. They certainly didn't  5 reveal that to us, as they should have.</p> <p>6 Q. Did you ask them where it was  7 domiciled?</p> <p>8 A. Yvette didn't know.</p> <p>9 Q. I'm asking if you asked?</p> <p>10 A. I asked Yvette. She didn't know.</p> <p>11 Q. When was that?</p> <p>12 A. At the signing. I said, what is this  13 Eastern Profit Corporation?</p> <p>14 Q. You asked, what is this Eastern Profit  15 Corporation?</p> <p>16 A. Yes.</p> <p>17 Q. And what did she say?</p> <p>18 A. She said, I don't know, it's something  19 that Mr. Guo has his own -- it's his own company.</p> <p>20 Q. And was there any followup to that or  21 was that the end --</p> <p>22 A. No.</p> <p>23 Q. -- of the discussion?</p> <p>24 A. That was the end of the discussion.</p> <p>25 Q. Okay.</p>

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<p>1        A.    It was supposed to be funded. The  2    entire contract was supposed to be funded.  3    Apparently, it wasn't.</p> <p>4        Q.    Let's go back to Exhibit 7. I think  5    previously you had mentioned that you saw this  6    Exhibit 7 when Mr. Guo put it on a table at a  7    meeting, is that right?</p> <p>8        A.    I believe this is correct.</p> <p>9        Q.    And when was the next time you saw this  10   information?</p> <p>11      A.    When we actually printed it off from  12   the USB key. After three different attempts of  13   corrupted USB keys from Yvette, we finally were  14   able to print it off ourselves onto a virgin  15   computer.</p> <p>16      Q.    Okay. When did -- when was the first  17   time you saw this information after the coffee  18   table viewing?</p> <p>19      A.    When we printed it off after we got the  20   corrupted USB keys from Yvette.</p> <p>21      Q.    What date was that?</p> <p>22      MR. SCHMIDT: What date?</p> <p>23      A.    Oh, I'm sorry. I guess it was about  24   the -- oh, God, about the -- oh, the 8th, the 8th  25   of January it would have been. It would have</p>	<p>1    to Strategic Vision?</p> <p>2        A.    None, other than a friend who kindly  3    was trying to see if there was something the  4    matter with the flash drives, which clearly there  5    were. So then I came to New York on Monday to  6    meet her, that is Yvette, at the Pierre, in the  7    lobby. I brought another computer. She brought  8    three flash drives. One worked, and that was  9    this, this one; in other words, this file. The  10   other two were corrupted.</p> <p>11      I kept them, kept all of the flash  12   drives. I took the one that was good, I brought  13   it back to Washington and put it into a virgin  14   computer, and then we printed this thing off. A  15   virgin computer, for the benefit of the court, is  16   one that has no connection to the internet and/or  17   a printer that has any connection to an internet.  18   So it's like a dumb computer.</p> <p>19      Q.    Does Strategic Vision have any kind of  20   confidentiality arrangement with Richard Shewell?</p> <p>21      A.    No.</p> <p>22      Q.    Is Richard Shewell a member of the team  23   or otherwise --</p> <p>24      A.    No.</p> <p>25      Q.    Let me just finish the question for the</p>
<p>1    been Monday, because I had to come up to New York  2    to get it.</p> <p>3        Q.    So you didn't see the information in  4    Exhibit 7 on January 6, 2018 when it was -- the  5    contract was signed?</p> <p>6        A.    No.</p> <p>7        Q.    You didn't view it?</p> <p>8        A.    I -- it wouldn't open, that was the  9    problem. That's why I had to come to New York.  10   On the 6th, she gave us three keys, three USB  11   keys. Two would not open. The third one would  12   not open on my computer, and so that's when I  13   took it to my neighbor and he was kind enough to  14   put it into his computer, just to see if anything  15   would open. All it was was complete corrupted  16   file, just nothing but Chinese characters all  17   over the place. It had no -- nothing like this.  18   So we both starting pulling all of the wires out  19   of his computers and his hard drives and -- yeah,  20   and yanked the flash drive out and everything  21   else. It was a nightmare.</p> <p>22      Q.    And who's your neighbor?</p> <p>23      A.    You have the letter. His name is  24   Richard Shewell, S-h-e-w-e-l-l.</p> <p>25      Q.    And What's Mr. Shewell's relationship</p>	<p>1    record. Is Richard Shewell part of Strategic  2    Vision's team or teams that provide investigatory  3    research?</p> <p>4        A.    No.</p> <p>5        Q.    So once you've accessed this  6    information on January 8th, what did Strategic  7    Vision do next?</p> <p>8        A.    On January 8th?</p> <p>9        Q.    Yes. Now that you have the list of  10   fish.</p> <p>11      A.    So now that we've printed off this  12   file, then Mike came and we sat down and we  13   started talking about how we were going to --  14   where we could -- which certain things we could  15   put together and enter into our channels for  16   information. And then we -- then he got in touch  17   with Team 1, that had been sort of sitting on  18   hold, and then -- then there were meetings with  19   Team 1 leader, and we began.</p> <p>20      Q.    So just this initial process with  21   Dr. Waller, were you parsing to see who was going  22   to do what in terms of the investigation, is that  23   fair?</p> <p>24      A.    Somewhat, yes. It's a very complex  25   investigation. It takes the U.S. side as well as</p>

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<p>1 international side. We had to divide up the  2 issues.</p> <p>3 Q. Were there aspects of the research that  4 he was going to handle and aspects that you were  5 going to handle, or Strategic Vision was going to  6 handle?</p> <p>7 A. I would say so, yes.</p> <p>8 Q. And what portion of the research was  9 assigned or delegated to Strategic Vision, or you  10 personally?</p> <p>11 A. The U.S. side, where we felt that we  12 could pull certain pieces of information legally  13 from U.S. channels, so we had to go through and  14 see who supposedly had a U.S. passport, U.S.  15 visas, or who had, you know, illegitimate  16 children born in the United States. It was a --  17 it was big. It was a big issue.</p> <p>18 Q. And what portion -- I take it Mr.  19 Waller was going to do the international portion?</p> <p>20 A. No, Dr. Waller.</p> <p>21 Q. I'm sorry. I was calling him Mr.  22 Waller the whole last deposition, so correct me,  23 please, feel free. Dr. Waller.</p> <p>24 What was Dr. Waller assigned to in  25 terms of this division?</p>	<p>1 Q. Of course not. Right.</p> <p>2 A. I want the court to be -- have a very  3 clear reading of what is being asked.</p> <p>4 Q. Me, too.</p> <p>5 A. Good.</p> <p>6 Q. And so then how did you -- were you  7 managing the U.S.-based process personally?</p> <p>8 A. Yes. Um-hum.</p> <p>9 Q. So you've got the information on  10 January 8th. What did you do in terms of that  11 process? What was --</p> <p>12 A. Mike and I, as I said, divided up what  13 needed to be done. I got in touch with my  14 channels, he got in touch with his channels.</p> <p>15 Q. Just without even saying who your  16 channels are or what they do, did you get in  17 touch with several people; how many people did  18 you get in touch with?</p> <p>19 A. I have no idea. There were a number of  20 people.</p> <p>21 Q. And did you receive valuable  22 information from those people?</p> <p>23 A. Some, I did and some was -- was fake  24 information. You have to understand that we were  25 given fake names and fake information to either</p>
<p>1 A. He was assigned to work with Team 1 to  2 help pull the information with Team 1, because  3 there were a number of things that they had to  4 get into, but they could only do it from an  5 overseas location.</p> <p>6 Q. I see. So none of the U.S.-based  7 investigatory research was handled by Team 1?</p> <p>8 A. No. Well, no. It was all done -- it  9 was done through the U.S. side.</p> <p>10 Q. And that was not Team 1?</p> <p>11 A. No, it's never been Team 1.</p> <p>12 Q. Got it. I just want to be clear about  13 it. The way you're saying no could be  14 interpreted multiple ways, so I just want to be  15 super clear.</p> <p>16 A. Not really.</p> <p>17 Q. Okay.</p> <p>18 MR. SCHMIDT: Just --</p> <p>19 THE WITNESS: I know. It's silly.</p> <p>20 Q. You could just -- it's not. It's a --  21 you have to understand, ma'am, it's a record that  22 we're trying to keep clear for the court, and I  23 just don't want there to be ambiguity.</p> <p>24 A. I wouldn't want any ambiguity for the  25 court.</p>	<p>1 send us down rabbit holes for nothing, a waste of  2 time, or we could find legitimately that there  3 were some people that we could actually piece  4 together some of the tracking. But their names  5 had been changed. They kept changing their  6 names.</p> <p>7 Q. So when did you -- when did you first  8 find out that, in your understanding, some of the  9 names were fake; when did that happen?</p> <p>10 A. I would say probably within the  11 first -- probably within the first ten days. And  12 we discussed that with Lianchao and we discussed  13 it with -- with Guo.</p> <p>14 Q. Okay. How was -- was there a meeting  15 with Lianchao --</p> <p>16 A. Yes.</p> <p>17 Q. -- and Guo where that was discussed?</p> <p>18 A. Yes.</p> <p>19 Q. Where was that?</p> <p>20 A. In New York, at his apartment. We  21 never met Guo outside of his apartment. He never  22 left his apartment.</p> <p>23 Q. And when did that meeting occur?</p> <p>24 A. I guess it was, as I said, within the  25 ten days from the 8th, 9th, which was like a</p>

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<p style="text-align: right;">Page 182</p> <p>1 Monday or a Tuesday, to about the 15th or so of  2 the month, 16th, something like that.</p> <p>3 Q. Was Ms. Wang there?</p> <p>4 A. Where?</p> <p>5 Q. At that meeting that you've just  6 described.</p> <p>7 A. Who knows. He kept saying he didn't  8 trust her.</p> <p>9 Q. I'm asking whether you recall her being  10 present?</p> <p>11 A. No, I don't remember, because sometimes  12 she was in there and sometimes Lianchao was  13 there, so I don't remember. He said he didn't  14 trust her, so a lot of times he sent her out.</p> <p>15 Q. In other words, she might have been in  16 the area, in the building that you were meeting  17 in, but he would say, leave the room?</p> <p>18 A. Yes.</p> <p>19 Q. And you would have the meeting without  20 her?</p> <p>21 A. Yes, that happened.</p> <p>22 Q. How many times did that --</p> <p>23 A. On several occasions.</p> <p>24 Q. And were you and Dr. Waller  25 coordinating and checking in on the research</p>	<p style="text-align: right;">Page 184</p> <p>1 A. That tended to be the case. I mean, he  2 might say, I've landed, or he might say, I just  3 finished my meeting, or, I'm on the way back.  4 That's about the limit of it.</p> <p>5 Q. And would those be Signal messages or  6 some other communication means?</p> <p>7 A. Usually on Signal.</p> <p>8 Q. Did you keep your Signal messages with  9 Dr. Waller?</p> <p>10 A. I turned over everything I had to --  11 whatever is there to Joe.</p> <p>12 Q. Right. I'm asking --</p> <p>13 A. To the law firm.</p> <p>14 Q. I'm asking if you -- did you delete  15 Signal messages you had with --</p> <p>16 A. Some I have.</p> <p>17 Q. -- Dr. Waller?</p> <p>18 A. I always do. Because some I -- I don't  19 keep Sig -- all of my Signal messages. That  20 means for everybody, not just for Guo.</p> <p>21 Q. I understand. And why is it your  22 practice to delete messages like that?</p> <p>23 A. Because that's what it's set up for.  24 That's what Signal does.</p> <p>25 Q. Oh, there's like an automatic</p>
<p style="text-align: right;">Page 183</p> <p>1 after this January 8th start date?</p> <p>2 A. Oh, yeah. I mean, obviously, I  3 couldn't -- I could only do from my side what I  4 could do on retrievals. What he was doing with  5 Team 1 was -- was totally different because it  6 was overseas, and so, therefore, he was  7 coordinating with the person on the overseas  8 retrieval, and I was not a party to that.</p> <p>9 Q. Right. How did you check in with one  10 another? Would you meet in --</p> <p>11 A. Daily.</p> <p>12 Q. -- D.C.?</p> <p>13 A. No, no, no, he would come to my home.  14 We never did anything on the telephone.</p> <p>15 Q. So after -- well, starting on  16 January 8th, you and Dr. Waller were meeting  17 almost daily to handle this investigation?</p> <p>18 A. I would say so, yes.</p> <p>19 Q. But of course you couldn't communicate  20 with him when he was flying to Europe or things  21 of that nature, correct?</p> <p>22 A. No.</p> <p>23 Q. Because you wouldn't. Because, even  24 though you could communicate with him, for  25 security reasons, you would not do that?</p>	<p style="text-align: right;">Page 185</p> <p>1 destruction policy?</p> <p>2 A. There's an automatic destruction thing,  3 It's 30 minutes or 30 whatever. An hour.</p> <p>4 Q. Okay. That's one of the features of  5 the application?</p> <p>6 A. Yes.</p> <p>7 Q. Did you ever ask Mr. Guo or Lianchao or  8 Yvette Wang how they got the information in  9 Exhibit 7?</p> <p>10 A. Yes, they told me.</p> <p>11 Q. What did they tell you?</p> <p>12 A. Guo said, this is the file, he slammed  13 down on the coffee table like that in front of me  14 in his apartment, in his sun room, and said, this  15 is what we need to investigate, these are the  16 people we need to look into, and, here, you can  17 look through the names. And I said, wow. He  18 said, I paid \$250 million for this. I said,  19 really.</p> <p>20 Q. I take it you didn't believe that  21 price?</p> <p>22 A. I found that extraordinary, given just  23 even the preliminary stuff that was on it.</p> <p>24 Q. And did he explain to you how the  25 information was obtained by him, other than</p>

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<p>1     obviously paying for it, what means were  2     employed?</p> <p>3       A.    He bribed people to get it, bribed  4     people to take photographs of passports, I guess.  5     I don't know.</p> <p>6       Q.    Did he tell you that or is that your  7     assumption?</p> <p>8       A.    He actually told me that. I mean, he  9     said that in the meeting. He said, yeah, I had  10    to bribe people to take pictures of passports.  11    Otherwise, I don't know where the other  12    information came from.</p> <p>13      Q.    Let's go to the next document.  14           (Wallop Exhibit 10, Signal messages,  15     Bates stamped Eastern-0000201, marked for  16     identification.)</p> <p>17      Q.    This has been marked Wallop 10. Do you  18     recognize this Signal thread?</p> <p>19      A.    Well, it looks like it's from me, and  20     probably to Yvette.</p> <p>21      Q.    Did you ever exchange Signal messages  22     with Lianchao Han?</p> <p>23      A.    I'm sure I have. It may or may not  24     have had anything to do with this, the contract.</p> <p>25      Q.    So you've worked with Mr. Han on other</p>	<p style="text-align: center;">Page 186</p> <p>1       Q.    Did you discuss any other terms at that  2     point, or was that just the focus, the number of  3     fish, during the first month?</p> <p>4       A.    It was the number of fish for the first  5     month.</p> <p>6       Q.    I'm asking from your memory --</p> <p>7       A.    Yes.</p> <p>8       Q.    -- do you recall discussing any other  9     terms of the agreement?</p> <p>10      A.    No, we didn't change that term. She  11     knew that, in the second month, it would be ten  12     fish.</p> <p>13      Q.    And did you redraft or edit the  14     agreement based upon this discussion?</p> <p>15      A.    Not that I recall, no.</p> <p>16      Q.    Well, you did put in that there would  17     be 15 fish during the first month instead of  18     the --</p> <p>19      A.    Yes, because we'd already -- when was  20     this? This was 12/29.</p> <p>21      Q.    28.</p> <p>22      A.    12/28. And I can't even remember on  23     the contract whether it's -- I don't know if we  24     even defined whether it was 15 in the first month  25     or not, but we went ahead and agreed to the 15;</p>
<p>1     matters or --</p> <p>2       A.    Well, we're pro-democracy, and he  3     represents a pro-democracy group in Washington;  4     and so, yes, there are issues that are going on  5     about the mainland that had nothing to do with  6     Guo.</p> <p>7       Q.    Going to Eastern 203.</p> <p>8       A.    Yes.</p> <p>9       Q.    Do you see where it says, "yes let's  10    discuss now"?</p> <p>11      A.    Yes.</p> <p>12      Q.    And below that there's like a little  13    phone symbol, do you see that?</p> <p>14      A.    Correct.</p> <p>15      Q.    Do you recall speaking to Ms. Wang  16     about this agreement on or about December 28th?</p> <p>17      A.    That would have been correct, because  18     that's when they sort of were changing the terms  19     of the contract from ten fish to 15 fish, and  20     that's what the 15 refers to in her...</p> <p>21      Q.    And you had a phone conversation about  22     that?</p> <p>23      A.    Yes, it's right here. And then I put  24     it in -- or she put it in there, and then you'll  25     see the rest of it.</p>	<p style="text-align: center;">Page 187</p> <p>1       so, gave her five fish, basically.</p> <p>2       Q.    Did you ever give her a copy of the  3     agreement for her to make edits?</p> <p>4       A.    Yes.</p> <p>5       Q.    When was that?</p> <p>6       A.    Because when we talked about it, she  7     was talking to Guo all the time on the telephone,  8     and we made edits. I remember when she was at  9     the house earlier that -- maybe during this time  10    frame, the 29th, or 28th or something. "We are  11    looking at your changes and have made a combined  12    document based on our conversation yesterday and  13    our mutual agreement." This was on the 29th.</p> <p>14           So we made it at my house, and then we  15    agreed to it, and then I went and printed it off  16    from my printer.</p> <p>17      Q.    Right. What I'm asking is, did you --  18    you physically gave her a --</p> <p>19      A.    Yeah.</p> <p>20      Q.    -- a paper copy?</p> <p>21      A.    Yes, we both did. I mean, we both had  22    the same piece of paper that we were scratching  23    up and redoing.</p> <p>24      Q.    I wasn't sure of that, that's why I'm  25    asking. I don't know that.</p>

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1           So she left with a copy of the draft 2   agreement on or about -- 3       A.    I believe so -- 4       Q.    -- December 29th? 5       A.    -- yes. It says here, "most easy 6    edits, no worries." 7       Q.    And that was your comment, correct? 8       A.    Yes. 9       Q.    Why did you think they were mostly easy 10    edits? 11      A.    Well, because she had -- she had made 12    the suggestion on the edits, so I made the 13    agreement to go ahead and make the little 14    changes, whatever they were. 15      Q.    And did you meet with Ms. Wang again on 16    or about December 30th? 17      A.    Honestly, I can't remember the 30th. I 18    do remember the -- I guess it says -- see, here 19    it's the 5th. I think it was the 5th that I met 20    her next. 21      Q.    Let me ask you this. Do you recall a 22    meeting with Ms. Wang where you thought that she 23    was proposing major and unreasonable changes? 24      A.    Somewhere in that earlier part of that 25    conversation, and that's when we made the changes	1       A.    No. It was Mandarin, so he was just 2    speaking to his employee, I guess. 3       Q.    But you -- sitting here today, you're 4    not certain that it was him? 5       A.    I could hear his voice, so it sounded 6    like him. 7       Q.    Turning to Eastern 206. 8       A.    Yes. 9       Q.    Do you see this message talking about 10    "unfortunately they could not stop the process 11    technically. My Boss said he had already 12    contacted you about this fund...we were 13    discussing last week, as I advised you that our 14    people were ready to send you the deposit." Do 15    you see that? 16      A.    I do. I was very confused by that. 17      Q.    There's a PDF that was attached to this 18    document, do you see that? 19      A.    Yes. 20      Q.    Do you have any recollection as to what 21    was sent to you on or about January 2nd 22    concerning this deposit? 23      A.    This was, I believe, the copy of the 24    DBS wire. I'm not sure, but I think it was. 25      Q.    And what was your response to receiving
1       in the edits. She then consulted with Guo. Guo 2    agreed to them, there might have been something 3    he disagreed with, and then he disagreed with 4    her, and then we went back and re-did the edit 5    back to sort of what the original language must 6    have been in the final copy that she signed, and 7    he agreed to, on the telephone. 8       Q.    Was that on January 6th, on the actual 9    date of the signing? 10      A.    No, it was a little bit earlier. I 11    think it goes back here to wherever we were 12    talking about mostly easy edits. 13      Q.    Okay. Was Mr. Guo on the phone when 14    you and Ms. Wang signed the agreement? 15      A.    Yes, I think he was. I think he was. 16    Because she sat on the sofa with me, and that's 17    where she was talking to somebody, so I -- in 18    Mandarin, so I presume that's who it was. 19      Q.    Okay. So you didn't know who she was 20    talking to at that point, but -- 21      A.    No, but she -- it was clear to me that 22    it was Guo. She just sort of hung up, she said, 23    okay, fine, we all agree, everything is fine. 24      Q.    But he wasn't on speakerphone, so you 25    didn't hear his voice?	1       the wire? Because, correct me if I'm wrong, but 2    the contract had not been signed as of 3    January 2nd, 2018, correct? 4       A.    Not by the 2nd, but we had agreed to 5    everything on the terms, even though she had to 6    come back from New York to sign the document; we 7    had agreed by telephone. 8       Q.    Were you surprised to receive the money 9    at that time? 10      A.    Not entirely. But we -- we -- it came 11    from a source that we didn't know who it was. It 12    came from ACA Capital or something. We didn't 13    know who that was. 14      Q.    So how did you find out about that? 15    Did this message prompt you to check your account 16    or was it that you checked your account and said, 17    why is there a million dollars there? What was 18    the process? 19      A.    It was very simple. I got this 20    message -- 21      Q.    I see. 22      A.    -- I checked the account. Something 23    from ACA was there. Said, my boss, meaning Guo, 24    said he had already contacted us about this fund. 25    We never got any contact from Guo. Never. Never

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<p style="text-align: right;">Page 194</p> <p>1 received a phone call, never received a text,    2 nothing. So I don't know what she's talking    3 about here.</p> <p>4 "Our contract won't be changed if there    5 is a chance to work together. Otherwise please    6 kindly return fund." These people were like    7 ping-pong balls, okay? You're just trying to do    8 what they're asking you to do, you get everything    9 in order to do it, and then they fool around with    10 this nonsense.</p> <p>11 Q. Did you consider sending the wire back    12 because you didn't have a signed contract or --</p> <p>13 A. No, because we already had agreed to    14 this verbally. Both Guo and herself had agreed    15 to it. And so she then comes down on the 5th,    16 and signs the thing on the 6th.</p> <p>17 Q. And so, going back to the 6th. Were    18 there any changes made to the agreement at that    19 time?</p> <p>20 A. No, none. The only change was that I    21 accepted the 15 fish instead of the ten, I mean,    22 verbally. It was a verbal, honorable thing to    23 do. And then here's my thing saying right what I    24 said on whatever it is, 208, as discussed with    25 the 15 fish.</p>	<p style="text-align: right;">Page 196</p> <p>1 the 5th and she had the bad flash drives, okay?    2 That's when I went to the next door neighbor,    3 just to stick it in to see if it was alive or    4 not. He didn't see anything, because there was    5 nothing to see, and he couldn't have seen    6 anything even if he had. So that's exactly what    7 happened.</p> <p>8 Q. Turning to Eastern 211. You wrote,    9 "the agreement for 3 months is correct." Do you    10 see that at the top of the page?</p> <p>11 A. Yes.</p> <p>12 Q. What did you mean by that?</p> <p>13 A. Because the contract was for three    14 months, was for 90 days. January, we have    15 allowed 15 fish. Ten fish each for February and    16 March; for some reason, that's sort of cut off.    17 Oh, here it is, March. "We will determine the    18 subsequent monthly costs obviously by the next    19 set of numbers of fish in the tank."</p> <p>20 Q. So what would happen after 90 days?</p> <p>21 A. We were all going to regroup and figure    22 out how much -- how many of the fish had -- were    23 useful information for him and how many fish had    24 been tossed out, and then he was going to be    25 adding more fish. He said up to 4,000 fish,</p>
<p style="text-align: right;">Page 195</p> <p>1 Q. Did you tell Yvette that they shouldn't    2 have sent the wire from where they had?</p> <p>3 A. Well, I -- later on I did. Lianchao    4 told her; like, what were you thinking?</p> <p>5 Q. So you had a conversation with Lianchao    6 about the wire --</p> <p>7 A. Later.</p> <p>8 Q. -- being done properly?</p> <p>9 A. Later, later. Like, two weeks later.</p> <p>10 Q. And you understood that Lianchao had    11 conveyed that to --</p> <p>12 A. Yes.</p> <p>13 Q. -- Ms. Wang?</p> <p>14 A. Well, to Guo. He played those two back    15 and forth. He played Yvette against Lianchao,    16 Lianchao against Yvette.</p> <p>17 Q. Turning to Eastern 208. It says, "We    18 hope you will have the docs as discussed for the    19 15 fish with you?"</p> <p>20 A. That's right.</p> <p>21 Q. And so what was -- was that the -- you    22 already understood what that was, that was --</p> <p>23 A. That was this.</p> <p>24 Q. -- Exhibit 7?</p> <p>25 A. Yes. And that's when she arrived on</p>	<p style="text-align: right;">Page 197</p> <p>1 total.</p> <p>2 Q. Would it have been possible to do    3 investigations on 4,000 fish?</p> <p>4 A. Not all at once, and he knew that. He    5 agreed that would be ridiculous. It was supposed    6 to be a three-year contract.</p> <p>7 Q. But it was a -- you're saying it was a    8 three-month contract?</p> <p>9 A. It was three months, to be done for a    10 year, if you look at the contract itself, and    11 then, after that time, it was a three-year    12 contract. If you recall, on the last page of the    13 agreement, "duration of this contract shall be    14 enforced for three years from the date of    15 signing." That's what we had initially planned    16 on. We certainly had initially planned on the    17 first three months.</p> <p>18 Q. On Eastern 213, do you see where it    19 says, "can you please send the contract here? I    20 get the right person to do. Thank you"?</p> <p>21 A. That was weird.</p> <p>22 Q. What did you understand that request to    23 mean?</p> <p>24 A. Well, we certainly weren't going to    25 send it through any kind of email thing. So she</p>

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<p style="text-align: right;">Page 198</p> <p>1 had to sign it -- she had to come -- she signed  2 it on the 6th. So she says, "please send the  3 contract here I get the right person to do." I  4 don't know what that meant. "There is of course  5 no impasse here. I work with several people, M  6 is one of them saying for this project he is not  7 only boss." Well, that was news to us.</p> <p>8 Q. I'm just asking about why you didn't  9 send the contract when it was requested there?</p> <p>10 A. Because we still didn't have -- oh,  11 dear lord. We still didn't have the flash  12 drives. This was the 5th. We didn't get the  13 proper flash drives with the folder until the  14 8th, Monday the 8th. So what could we do, except  15 take -- except have her sign the contract. They  16 had already sent the money, we all had agreed to  17 the terms. She needed to sign the contract.  18 Then I went to New York to get a flash drive  19 that, God willing, would work, out of the three.</p> <p>20 And we tried to explain to them that  21 their systems were corrupted. If she was  22 downloading, or he was downloading the stuff from  23 his own computer, he was getting -- he was being  24 hacked into by the Chinese himself. Because you  25 can't make this stuff up on the -- on the</p>	<p style="text-align: right;">Page 200</p> <p>1 it."</p> <p>2 A. Correct. And New York was equally  3 adamant about it. That was Guo.</p> <p>4 Q. I was going to say, who's New York?</p> <p>5 A. That was Guo.</p> <p>6 Q. And L is Lianchao?</p> <p>7 A. Yes.</p> <p>8 Q. And who's M?</p> <p>9 A. Michael, Mike, Dr. Waller.</p> <p>10 Q. Turning to Eastern 19. You wrote,  11 "Thank you. I will look forward to seeing you  12 tomorrow here. You can make whatever minor  13 changes here on my laptop and then print off two  14 copies"?</p> <p>15 A. Correct. That meant print off two  16 copies of the agreement.</p> <p>17 Q. Right. What were the changes or issues  18 that you were thinking of at that time?</p> <p>19 A. Whatever changes we made that were --  20 she would -- I mean, whatever was made was made,  21 and we agreed to in the document. I don't  22 remember. They were minor.</p> <p>23 Q. You said, "we've already lost a week"?</p> <p>24 A. That's right.</p> <p>25 Q. What did you mean by that?</p>
<p style="text-align: right;">Page 199</p> <p>1 corrupted files.</p> <p>2 Q. But before January 6th, you weren't  3 aware of any corruption or hacking issues, were  4 you?</p> <p>5 A. Yes, absolutely.</p> <p>6 Q. How were you supposedly aware of that?</p> <p>7 A. Well, because we had a corrupt -- when  8 we were even sitting there, I think at one point  9 Guo had a USB key and he was putting it into his  10 own computer, and it was acting up, and he took  11 it out and he said, I can't -- I can't do the  12 file here.</p> <p>13 Q. When was that?</p> <p>14 A. It was before -- this must have been  15 sometime in mid-Jan -- mid-December, whenever we  16 were up there meeting with him, he had an issue  17 with the computer. And Mike told him, he said,  18 you know, you got -- you got issues here that  19 have nothing to do with us.</p> <p>20 Q. You wrote, "As you know, the agreement  21 can only be reviewed and cannot be sent by email  22 for the purpose of absolute security"?</p> <p>23 A. Correct.</p> <p>24 Q. It says, "Other than New York, L, M and  25 myself and you, we are the only ones privy to</p>	<p style="text-align: right;">Page 201</p> <p>1 A. If we didn't have this, we couldn't  2 start. If we didn't have the entire file, we  3 couldn't start, could we? Because we had no  4 information to go on.</p> <p>5 Q. Did you understand that time was an  6 important factor?</p> <p>7 MR. SCHMIDT: Objection.</p> <p>8 A. Of course it was an important factor.</p> <p>9 Q. Why was that?</p> <p>10 A. Because we were prepared to go, but,  11 due to their corrupt files, we couldn't start  12 until we got the full document that was not  13 corrupted.</p> <p>14 Q. Right. But this is January 5th, right,  15 this email message or Signal message?</p> <p>16 A. Yes.</p> <p>17 Q. And so I'm just asking, you hadn't  18 seen -- or you hadn't received the files that had  19 any alleged issues with it in terms of --</p> <p>20 A. Yes. She came on the 5th, she put the  21 files in, they didn't work, they were corrupted.  22 I then had to get on the train and come up here  23 on the Monday morning, the 8th, okay, to get the  24 USB file that was clean. Out of the three, there  25 was only one that was clean.</p>

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<p style="text-align: right;">Page 202</p> <p>1 Q. I thought --</p> <p>2 A. So we couldn't start.</p> <p>3 Q. -- the agreement was signed on</p> <p>4 January 6th, though?</p> <p>5 A. Yes, but we couldn't start until we had</p> <p>6 clean files. She thought she had clean files,</p> <p>7 and she didn't have them on the 5th and 6th, did</p> <p>8 she?</p> <p>9 Q. I don't understand how you thought you</p> <p>10 lost a week, if you hadn't even signed an</p> <p>11 agreement yet?</p> <p>12 A. Because the funds had been sent, right,</p> <p>13 on the 29th, and let's call it the 2nd that we</p> <p>14 had received them, and, in fact, they didn't</p> <p>15 really get into our account until the 4th because</p> <p>16 of the holiday weekend and so forth. And then</p> <p>17 Citibank called to say, are -- is this your --</p> <p>18 are these -- you expecting this? I said yes. So</p> <p>19 they were fine. But they were not available --</p> <p>20 there's something known as a federal reserve,</p> <p>21 that stops large payments. Anything over, like,</p> <p>22 \$300,000 gets flagged. So we had to verify that</p> <p>23 this was a contract.</p> <p>24 Q. Let's go to Eastern 223. Do you</p> <p>25 remember Ms. Wang sending you a Signal message</p>	<p style="text-align: right;">Page 204</p> <p>1 Q. The financial, forensic research,</p> <p>2 current tracking and social media?</p> <p>3 A. There were not reports, other than</p> <p>4 flash drive information, which we've already</p> <p>5 answered that.</p> <p>6 Q. Of course we have, yes, but they are</p> <p>7 referred to as reports in the agreement, so</p> <p>8 that's why I'm using that term.</p> <p>9 A. They're flash drives.</p> <p>10 Q. Okay.</p> <p>11 A. They're not written.</p> <p>12 Q. And the teams that are already</p> <p>13 dispatched, how many teams were dispatched as of</p> <p>14 January 9th?</p> <p>15 A. Well, One was in the process of</p> <p>16 being -- Number One was being in the process of</p> <p>17 being dispatched because it was an overseas</p> <p>18 person that was -- that Mike had to coordinate</p> <p>19 with, and we had to get -- we had to get numerous</p> <p>20 computers and different kinds of phones and</p> <p>21 burner phones and everything. It's a huge</p> <p>22 operation.</p> <p>23 Q. Were you involved at all in the</p> <p>24 logistics of that operation?</p> <p>25 A. No. Mike was.</p>
<p style="text-align: right;">Page 203</p> <p>1 asking to accommodate two small fish?</p> <p>2 A. Two more small fish. So it would have</p> <p>3 made 17 fish, okay? No. The answer was</p> <p>4 absolutely no.</p> <p>5 Q. Well, let's just go one at a time.</p> <p>6 MR. SCHMIDT: Do you remember receiving</p> <p>7 the message or --</p> <p>8 THE WITNESS: Yes.</p> <p>9 MR. SCHMIDT: -- or --</p> <p>10 THE WITNESS: Yes.</p> <p>11 MR. SCHMIDT: Okay.</p> <p>12 Q. Okay. And what was your response?</p> <p>13 A. No. Absolutely no.</p> <p>14 Q. And why did you have that firm</p> <p>15 response?</p> <p>16 A. Because we've already given you five</p> <p>17 extra fish, if you will read my response.</p> <p>18 Q. They did have to pay for those 15 fish,</p> <p>19 though, right?</p> <p>20 A. Not really.</p> <p>21 Q. Okay.</p> <p>22 A. They didn't. They were five free fish.</p> <p>23 Q. And they were entitled to all three</p> <p>24 reports on those 15 fish?</p> <p>25 A. What reports?</p>	<p style="text-align: right;">Page 205</p> <p>1 Q. So he was involved in procuring the</p> <p>2 phones and computers and things of that nature --</p> <p>3 A. No.</p> <p>4 Q. -- for Team 1?</p> <p>5 A. Team 1 did it.</p> <p>6 Q. Okay. What other teams were dispatched</p> <p>7 as of January 9th, other than Team 1?</p> <p>8 A. That was the only "team team" outside</p> <p>9 of the United States. I was collecting or I was</p> <p>10 getting ready to begin to collect information</p> <p>11 from my own channels, which was not labeled as a</p> <p>12 team.</p> <p>13 Q. Right. I'm just trying to understand</p> <p>14 your message on Eastern 224. At the end it says,</p> <p>15 "Teams are already dispatched and beginning their</p> <p>16 trip"?</p> <p>17 A. That meant Mike and the person that was</p> <p>18 hiring the people to manage this particular</p> <p>19 account. It wasn't just one person with one</p> <p>20 computer. There were at least ten.</p> <p>21 Q. Ten individuals?</p> <p>22 A. Ten individuals.</p> <p>23 Q. On Team 1?</p> <p>24 A. On Team 1, at least.</p> <p>25 Q. And how did you know how many members</p>

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<p>1 of Team 1 there were?</p> <p>2 A. Because I was told that by Mike.</p> <p>3 That's all I know. I don't know who they were, I</p> <p>4 don't know their names. I don't know anything</p> <p>5 about it. We compartmentalized it.</p> <p>6 Q. Right. So you don't have any -- you</p> <p>7 played no role in assembling Team 1 or managing</p> <p>8 its actions?</p> <p>9 A. My expertise, young man, is --</p> <p>10 Q. I'm not that young, but go on.</p> <p>11 A. -- is 45 years of working in</p> <p>12 specialized areas, and I understand how to</p> <p>13 assemble the right people to do, God knows, the</p> <p>14 right job. And Mike was one of the people who</p> <p>15 did dispatch and organize Team 1.</p> <p>16 Q. Right. So you weren't involved with</p> <p>17 managing or assembling --</p> <p>18 A. Not on a --</p> <p>19 Q. -- Team 1?</p> <p>20 A. -- day-to-day because we were</p> <p>21 compartmentalizing it.</p> <p>22 Q. That's fine. You can -- I'm just</p> <p>23 asking for an answer.</p> <p>24 A. I'm giving you one.</p> <p>25 Q. Thank you.</p>	<p style="text-align: right;">Page 206</p> <p>1 understand. What was it between the 8th and the</p> <p>2 16th that caused a delay?</p> <p>3 A. Well, we didn't have the equipment to</p> <p>4 begin to do what we said we wanted to be able to</p> <p>5 do because of all of these weirdo delays with the</p> <p>6 flash drives.</p> <p>7 Q. In other words --</p> <p>8 A. They were corrupted flash drives,</p> <p>9 right?</p> <p>10 Q. In other words, you didn't have the</p> <p>11 equipment to do the research on, let's just say,</p> <p>12 January 1, you had to go and buy it --</p> <p>13 A. That's correct.</p> <p>14 Q. -- after the agreement was signed?</p> <p>15 A. That's correct. And why would that be?</p> <p>16 Q. I'll be asking the questions.</p> <p>17 A. I know --</p> <p>18 MR. SCHMIDT: Don't ask questions.</p> <p>19 A. -- but, I mean, this is absurd.</p> <p>20 MR. GRENDI: Why don't we take a little</p> <p>21 break.</p> <p>22 THE WITNESS: Yeah, I think we need a</p> <p>23 little break.</p> <p>24 MR. SCHMIDT: That's fine.</p> <p>25 THE WITNESS: You just don't get it.</p>
<p>1 A. You're welcome.</p> <p>2 Q. What was the issue that -- if we go to</p> <p>3 Eastern 227, that caused a delay of eight days?</p> <p>4 A. Okay, you have to take a calendar out</p> <p>5 and look at the calendar for January. It's easy</p> <p>6 to see. The 8th, Monday the 8th was when we</p> <p>7 finally got a decent copy of this, right</p> <p>8 (indicating)?</p> <p>9 Q. Exhibit 7?</p> <p>10 A. Yes, Exhibit 7.</p> <p>11 Q. Sure.</p> <p>12 A. That week, Mike and the person from</p> <p>13 Team 1 were coordinating how they were going to</p> <p>14 get the -- the equipment together. They had to</p> <p>15 drive to three different countries to get the</p> <p>16 information -- I mean, to get the equipment, so</p> <p>17 they wouldn't be tracked.</p> <p>18 The IP numbers and everything else</p> <p>19 would not be tracked. These would be, quote,</p> <p>20 technically, virgin computers, virgin phones,</p> <p>21 these would be burner phones. All of these</p> <p>22 communications had to be coordinated. So from</p> <p>23 the 8th of January to the 16th, I believe, makes</p> <p>24 eight days.</p> <p>25 Q. And that's what I'm trying to</p>	<p style="text-align: right;">Page 209</p> <p>1 THE VIDEOGRAPHER: Off the record at</p> <p>2 3:25.</p> <p>3 (Whereupon, a short recess was taken.)</p> <p>4 THE VIDEOGRAPHER: Back on the record</p> <p>5 at 3:32.</p> <p>6 Q. Still on Wallop 10, Bates number</p> <p>7 Eastern 227. Do you see where you wrote, "We</p> <p>8 have some new exotic fish options to discuss</p> <p>9 too"?</p> <p>10 A. Yes.</p> <p>11 Q. What did you mean by that?</p> <p>12 A. I think Mike and I had come up with</p> <p>13 some information that would have been interesting</p> <p>14 for Guo.</p> <p>15 Q. Why did you describe it as a fish</p> <p>16 option? What does that --</p> <p>17 A. I think exotic was the key word there,</p> <p>18 because it was outside of the parameter.</p> <p>19 Q. What do you mean by parameter? I just</p> <p>20 want to understand --</p> <p>21 A. Outside of the -- the 15 fish. It was</p> <p>22 additional information that we thought he might</p> <p>23 find useful. It had nothing to do with the 15</p> <p>24 fish.</p> <p>25 Q. What was that information?</p>

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1	A. Not in depth.	1 meeting, if you recall?
2	Q. This comment about, we expect to have a fairly full net, was just your assumption?	2 A. We had some information, and I can't remember if Mike had gotten -- I don't think he'd gotten the flash drive at that point, that
3		4 particular flash drive, but we were giving him a
4	A. Yes.	5 verbal update on certain people within the --
5	Q. And at that time, you didn't know if	7 within the file, Exhibit 7.
6	Team 1 was finding any information or good	8 Q. And you said before that you were
7	information, or anything of that nature?	9 working around the clock?
8	A. We were told that they were finding	10 A. Yes. They were.
9	information.	11 Q. But you weren't. You mean the team was
10	Q. So, again, how did you get that	12 or -- I just want to be precise here.
11	information if you didn't get it from Dr. Waller?	13 A. Well, I'm human. I don't work 24/7.
12	A. He told me, but I've said to you that I	14 Q. I didn't mean that, obviously. But you
13	only spoke a little bit to Michael. I did not	15 said you'd been working weekends on this; is that
14	know all of the details of that. He said that he	16 fair to say?
15	believed he had some good information that was	17 A. All of us were working, often.
16	going to make New York, New York, as we called	18 Whenever we found a lead, we'd go after it.
17	him, happy.	19 Q. And is that just standard procedure for
18	Q. I got it. Going to Eastern 235. At	20 --
19	the bottom of the page you wrote, "We have to	21 A. Yes.
20	finish shopping and we'll find a very nice	22 Q. -- and engagement of this nature?
21	present for." That's all it has there.	23 A. Yes.
22	What did you mean by finish shopping,	24 MR. SCHMIDT: Just let him finish the
23	if you recall?	25 question.
24	A. Well, we -- we're -- let's see. This	
25	was ten days into the contract, essentially. We	
Page 215		Page 217
1	were working through weekends, so we were trying	1 MR. GRENDI: That's okay.
2	to retrieve information, according to Mike, that	2 A. Yes.
3	was -- that we felt that was going to be very	3 Q. And does that schedule ever let up
4	useful for him. Again, I did not know what those	4 during an engagement or is it just typical for
5	specifics were.	5 the beginning of an investigatory research
6	Q. But the reference to shopping is the	6 project?
7	collection of information?	7 A. Well, something that was this intense,
8	A. The collection, yes.	8 where you had an increase -- mentally, you'd
9	Q. And a present would be, what, useful	9 already sort of planned out in the contract for
10	information?	10 ten. So you get a 33 percent increase. So you
11	A. Useful information.	11 have to sort of shift the -- the process, adjust
12	Q. And you said, "we'll be there on the	12 the process so that you can continue to keep
13	25th." Was that for a meeting that you were	13 going in.
14	planning with Mr. Guo and Lianchao and Yvette?	14 Again, I have to tell you, repeatedly,
15	A. Yeah, it was the 25th or the 26th. I	15 how many names were fake, how many -- how many
16	thought it was the 26th.	16 bits of information and addresses were fake, how
17	Q. If you turn to Eastern 238.	17 many rabbit holes these guys had to go down to --
18	A. Yeah.	18 to prove that there were not -- the information
19	Q. You see it says, "okay we'll do lunch	19 that Guo had been given for \$250 million, a lot
20	for the 26th"?	20 of it was rubbish.
21	A. Right.	21 Q. Just going back to that meeting on the
22	Q. And is that your recollection, that the	22 26th of January. Was any information presented
23	meeting was --	23 to the client?
24	A. Yes.	24 A. I think Mike did, yes, verbally.
25	Q. And what -- what happened at that	25 Verbally. We sat there and listened.

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<p style="text-align: right;">Page 230</p> <p>1 A. No.</p> <p>2 Q. Let's go to Eastern 259. Do you see</p> <p>3 where Dr. Waller wrote, "our understanding was</p> <p>4 that the first 90 days would be for starting up</p> <p>5 and developing the data"?</p> <p>6 A. I see that.</p> <p>7 Q. Was that Strategic Vision's</p> <p>8 understanding as well or just Dr. Waller's?</p> <p>9 A. No, it was our mutual understanding</p> <p>10 between Guo and myself and Lianchao and Mike.</p> <p>11 Q. Do you see where it says, he wrote, "We</p> <p>12 did not understand that he expected actual data</p> <p>13 in the first days or weeks"?</p> <p>14 A. Correct.</p> <p>15 Q. Again, you never talked to Dr. Waller</p> <p>16 about this exchange after --</p> <p>17 A. Not about --</p> <p>18 Q. -- it happened on the --</p> <p>19 A. -- this exchange, no.</p> <p>20 Q. Did you ever discuss the substance of</p> <p>21 this exchange, or something akin to it, about the</p> <p>22 expectations of the client?</p> <p>23 A. Perhaps later that -- when we were</p> <p>24 talking about what -- what we had been able to</p> <p>25 retrieve so far, and how we had -- let me just</p>	<p style="text-align: right;">Page 232</p> <p>1 Q. Right.</p> <p>2 A. Yvette was taken off the case in, as we</p> <p>3 understand it, beginning the 1st of February.</p> <p>4 And then she -- she sent us an email saying she</p> <p>5 was no longer in it, that only to -- to</p> <p>6 communicate with Lianchao.</p> <p>7 Q. Did Strategic Vision adjust its</p> <p>8 research approach based upon this request for</p> <p>9 more immediate results?</p> <p>10 A. No. In fact, we actually increased the</p> <p>11 pressure on Team 1, and then went and had a</p> <p>12 long -- several meetings with potential Team 2,</p> <p>13 and that's another side of it.</p> <p>14 Q. Is that a company that goes by the</p> <p>15 acronym ASOG?</p> <p>16 A. Yes. In Dallas. Outside of Dallas.</p> <p>17 Q. And why was it that ASOG was contacted</p> <p>18 in connection with this research agreement?</p> <p>19 A. Because we had the option of being able</p> <p>20 to bring in whatever teams we felt were going to</p> <p>21 be additionally viable, and also on the domestic</p> <p>22 side of some of the things that we were bumping</p> <p>23 into, or Mike and his team were bumping into on</p> <p>24 the international side, which were not pretty.</p> <p>25 So, we were given the names of the</p>
<p style="text-align: right;">Page 231</p> <p>1 read this. How Mike had explained very</p> <p>2 patiently, very calmly, very slowly, whether it</p> <p>3 was with -- or through Lianchao or through</p> <p>4 Yvette, how the process works.</p> <p>5 So, if Guo wanted to speed up and get</p> <p>6 everything really fast, then all the trap doors,</p> <p>7 all the doors that we had been able to open</p> <p>8 quietly, would be slammed shut. If Guo would</p> <p>9 just be patient and let us get into where we</p> <p>10 needed to go quietly, he was going to get an</p> <p>11 awful lot of information back.</p> <p>12 The irony is, that had he just relaxed</p> <p>13 and stayed on top of this, that is Guo, he would</p> <p>14 have had a huge amount of information three</p> <p>15 months a year in. Huge. We can't fix somebody's</p> <p>16 perception of how this is done. He was very</p> <p>17 impatient.</p> <p>18 Q. When did you understand that Mr. Guo</p> <p>19 was getting impatient?</p> <p>20 A. I guess around -- well, certainly on</p> <p>21 the 26th, when we sort of had our lunch with him,</p> <p>22 and then -- and then I think possibly through</p> <p>23 Lianchao; because, as I told you, we never had</p> <p>24 any direct contact with -- with Guo. It was</p> <p>25 always through Lianchao or Yvette.</p>	<p style="text-align: right;">Page 233</p> <p>1 fellows who had been with NSA, DIA, whatever,</p> <p>2 in -- in -- in Dallas, and we went and met with</p> <p>3 them, and they told us -- they looked at -- we</p> <p>4 only gave them like a couple of names, we never</p> <p>5 gave them the whole file.</p> <p>6 And they looked at it, and then we went</p> <p>7 back about a week later maybe, it might even have</p> <p>8 been ten days later, a week later, and they were</p> <p>9 totally freaked out. They said, you can't touch</p> <p>10 any of these people or any of these names. We</p> <p>11 said, what are you talking about?</p> <p>12 That's when they said, these are all</p> <p>13 RP. We will all go to jail if you start fooling</p> <p>14 around in their files.</p> <p>15 Q. So when did you first meet with ASOG,</p> <p>16 that meeting in Dallas you just described?</p> <p>17 A. Yeah, it would have been the beginning</p> <p>18 of February, I should think. Again, Mike has the</p> <p>19 date.</p> <p>20 Q. Is there any reason a second team</p> <p>21 wasn't assembled at the outset of the agreement?</p> <p>22 A. We did -- because of the element of</p> <p>23 retrieval we had to do outside of the United</p> <p>24 States, because he wanted it so fast and so</p> <p>25 quickly and intensely, that that was the fastest,</p>

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<p style="text-align: right;">Page 234</p> <p>1    quickest way of getting into certain files had    2    they not all -- had some of them not been fake,    3    then we would have had no -- we wouldn't have    4    gone to the second -- second dimension.</p> <p>5       Q.    And the decision to go with the second    6    team, was that Strategic Vision's --</p> <p>7       A.    Mine --</p> <p>8       Q.    -- decision or Dr. Waller's?</p> <p>9       A.    Mine and Mike's, yeah.</p> <p>10      Q.    Jointly?</p> <p>11      A.    Jointly.</p> <p>12      Q.    Okay.</p> <p>13      A.    We both went down twice.</p> <p>14      Q.    And you said RP. What does RP mean?</p> <p>15      A.    Restricted persons.</p> <p>16      Q.    And in your career in this    17    investigatory field, have you encountered    18    restricted persons before or --</p> <p>19      A.    Yes and no. It's had different    20    acronyms. Sometimes it's PP, protected persons.    21    Sometimes it's RP. But it means that it is    22    either under a watch list by the U.S. Government    23    or it is a -- or, let's just say a certain agency    24    has tagged these individuals and is watching them    25    themselves. So we cannot enter into those files</p>	<p style="text-align: right;">Page 236</p> <p>1    them the whole file. We only gave them like, I    2    don't know, maybe four or five names.</p> <p>3       Q.    Okay. But what I'm just trying to    4    understand is --</p> <p>5       A.    And I --</p> <p>6       Q.    -- and I know this sounds like a basic    7    question --</p> <p>8       A.    Right.</p> <p>9       Q.    -- and I apologize. But are all people    10    restricted persons in intelligence files or    11    government files?</p> <p>12      A.    No.</p> <p>13      Q.    Okay. So there are certain people --</p> <p>14      A.    No, no, no, no, no. These were tagged.</p> <p>15      Q.    Specially tagged?</p> <p>16      A.    These were tagged. And I -- again, you    17    would have to ask Mike. I don't know if it was    18    the whole file that was tagged or if it was just    19    four or five names they ran through the system.</p> <p>20      Q.    I see.</p> <p>21      A.    But they were all tagged; flagged,    22    tagged, whatever you want to call it.</p> <p>23      Q.    So when did you convey to the client    24    that there was this restricted persons    25    designation on some of the fish?</p>
<p style="text-align: right;">Page 235</p> <p>1    at all in the U.S.</p> <p>2       Q.    And these files you're talking about,    3    are these files government files or what kind of    4    files are they?</p> <p>5       A.    Your Exhibit 7, these names, all of    6    these names. We can't -- we don't know, because    7    we certainly were not peeking into those    8    government files.</p> <p>9       Q.    Oh, they're government files you're    10    talking about?</p> <p>11      A.    Yes. These are U.S. intelligence    12    files.</p> <p>13      Q.    I see. And sometimes those files are    14    accessible, if they're not records protected --    15    or, I'm sorry, restricted persons?</p> <p>16      A.    It just depends on the jurisdiction of    17    where you're looking into the file. We would    18    never do anything that would be anti-U.S. law.    19    And he was asking us to continue doing that, Guo    20    was.</p> <p>21      Q.    But just in terms of these people who    22    you -- ASOG told you were restricted persons.    23    There are some people, obviously, that are not    24    restricted persons, is that fair to say?</p> <p>25      A.    I have no idea. Because we didn't give</p>	<p style="text-align: right;">Page 237</p> <p>1       A.    We did that through Lianchao.</p> <p>2       Q.    And when was that?</p> <p>3       A.    Sometime in the middle of February, I    4    think, by the time we had gotten -- we had been    5    down to -- to Dallas.</p> <p>6       Q.    And so you went to Dallas with    7    Dr. Waller?</p> <p>8       A.    Twice. Twice we went to see him.</p> <p>9       Q.    Twice. Or see them twice. The irony was, we    10    then saw this group at a function in Washington,    11    at an intel or security defense function several    12    months later, and they said to us -- they said to    13    us, well, it's really weird, because they already    14    had figured out it was Guo that was the client.</p> <p>15       We never told them who the client was.</p> <p>16    So they told -- they -- they said, well, they    17    figured out it was Guo, and they said about a    18    week or so after we had been down there the    19    second time, that Guo had people go down to talk    20    to them.</p> <p>21       And we never told anybody who they    22    were. We didn't tell Lianchao who they were. We    23    didn't tell anyone. This was just between Mike    24    and me. So that was very weird.</p> <p>25       Q.    Do you think that was just a</p>

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<p style="text-align: right;">Page 238</p> <p>1 coincidence or is that --</p> <p>2 A. I would find it an extraordinary</p> <p>3 coincidence. These guys are so deep-sixed that,</p> <p>4 just even to physically find them is like</p> <p>5 difficult.</p> <p>6 Q. So deep-sixed, you mean they're</p> <p>7 inaccessible or --</p> <p>8 A. Inaccessible.</p> <p>9 Q. -- they keep a low profile?</p> <p>10 A. Yeah. They had a very low profile and</p> <p>11 they had a very low profile location.</p> <p>12 Q. And how is it that you knew about them,</p> <p>13 ASOG?</p> <p>14 A. Through Mike and one of his people.</p> <p>15 Q. And so, did there come a time when ASOG</p> <p>16 said, well, we can't do any research on this</p> <p>17 because of this --</p> <p>18 A. That's right.</p> <p>19 Q. -- records protected status?</p> <p>20 A. Yes. That's right.</p> <p>21 Q. I understand you're eager to move</p> <p>22 forward, but, just for the court reporter, just</p> <p>23 please wait for me to ask the question.</p> <p>24 Could Strategic Vision still perform</p> <p>25 some research, though, even though some of the</p>	<p style="text-align: right;">Page 240</p> <p>1 their new address, or some sort of preliminary</p> <p>2 stuff that was being brought up, but if you were</p> <p>3 getting into deeper stuff, you couldn't touch it.</p> <p>4 You shouldn't touch it. And I'm sure he conveyed</p> <p>5 that to the -- to the Team 1 leader.</p> <p>6 Q. So it's your understanding -- Strategic</p> <p>7 Vision's understanding that Team One's work was</p> <p>8 curtailed because of the discovery that certain</p> <p>9 fish were restricted persons or records</p> <p>10 protected?</p> <p>11 A. That's correct.</p> <p>12 Q. And that was on or about January 30th,</p> <p>13 or whereabouts?</p> <p>14 A. No, no, no, no, no, no, no. This was</p> <p>15 way into the middle, the 15th to the 20th,</p> <p>16 something in there, of February.</p> <p>17 Q. That's when ASOG conveyed to you</p> <p>18 that --</p> <p>19 A. Yes.</p> <p>20 Q. -- you were -- okay.</p> <p>21 So let's just get a clear record then.</p> <p>22 When did ASOG tell you that certain people</p> <p>23 were -- certain fish were records protected?</p> <p>24 A. At some point in Feb -- in the middle</p> <p>25 of February 2018.</p>
<p style="text-align: right;">Page 239</p> <p>1 individuals were designated as records protected,</p> <p>2 or restricted persons, I'm sorry?</p> <p>3 A. We did not know at that point, and by</p> <p>4 that time we got some kind of service for a</p> <p>5 lawsuit. And our teams, we had to let our teams</p> <p>6 overseas know on the 23rd of February that they</p> <p>7 had to stop.</p> <p>8 Q. I just want to ask this, though. Could</p> <p>9 Team 1 still do its job, even though ASOG found</p> <p>10 that certain individuals were, as you described,</p> <p>11 records protected?</p> <p>12 A. That's -- that's a question I'd have to</p> <p>13 leave for a lawyer in the -- in the IC,</p> <p>14 intelligence community, to answer. We wouldn't</p> <p>15 want to do anything that would be illegal.</p> <p>16 Q. So you didn't direct Team 1 to stop its</p> <p>17 work when ASOG gave its report to you that people</p> <p>18 were records protected?</p> <p>19 A. We did. Mike did. He did talk to</p> <p>20 them. And even though the -- he told them to</p> <p>21 stop doing anything that looked like it was</p> <p>22 peeking into something that they shouldn't be</p> <p>23 looking into.</p> <p>24 It's one thing to peek into somebody's</p> <p>25 license, driver's license number, or their --</p>	<p style="text-align: right;">Page 241</p> <p>1 Q. And then is it your understanding that</p> <p>2 Mike, very shortly thereafter, conveyed this</p> <p>3 information to Team 1?</p> <p>4 A. That's correct.</p> <p>5 MR. GRENDI: Let's do Exhibit 13.</p> <p>6 (Wallop Exhibit 13, Letter dated</p> <p>7 February 23, 2018, marked for</p> <p>8 identification.)</p> <p>9 Q. Do you recognize this document,</p> <p>10 Ms. Wallop?</p> <p>11 A. Actually, I never saw the letter. I</p> <p>12 gather it was delivered to -- it says here it was</p> <p>13 delivered to -- by hand delivery and electronic</p> <p>14 mail to me, but I was out of the country, and</p> <p>15 they had, in fact, sent it to the Nevada address.</p> <p>16 Q. The Nevada address, is that Strategic</p> <p>17 Vision's?</p> <p>18 A. Strategic Vision's Nevada agent</p> <p>19 address, yeah.</p> <p>20 Q. Does Strategic Vision have an office in</p> <p>21 Nevada?</p> <p>22 A. We have an agent.</p> <p>23 Q. Do you have a physical --</p> <p>24 A. Yes, it's an address.</p> <p>25 Q. -- location that you can --</p>

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1 A. Yes. It's on all the documents	1 A. I personally did not, no.	
2 somewhere.	2 Q. Do you know if Dr. Waller did that	
3 Q. I'm asking if Strategic Vision has like	3 or --	
4 an office with --	4 A. Well, he did on the 30th, obviously.	
5 A. No. It's an agent. It's an LLC.	5 Q. Right. I'm talking about after the	
6 That's where they set them up. Like Wyoming.	6 30th.	
7 Q. And what's in Wyoming, I'm sorry?	7 A. Okay. Well, I don't know. I don't	
8 A. LLCs. There are a lot of LLCs and	8 know.	
9 corporate trusts and so forth set up in Wyoming,	9 Q. Okay. It says, "Eastern agreed to	
10 as there are in Nevada.	10 delay the start of the contract by ten days from	
11 Q. Those are your corporate trusts and	11 January 6th to January 16th." Do you see that on	
12 LLCs?	12 the first page, Eastern 198?	
13 A. No.	13 A. Yes.	
14 Q. I just want to clear it up.	14 Q. Is that the ten-day grace period or	
15 You just mean it's a popular state for	15 accommodation that you were talking about --	
16 incorporation?	16 A. Correct.	
17 A. Correct.	17 Q. -- regarding the January --	
18 Q. Thank you.	18 A. Yes.	
19 So when did you first see this letter?	19 Q. -- 26, 2018 meeting?	
20 A. Oh, when I probably returned from the	20 A. Yes.	
21 Middle East; I think it was probably, I don't	21 Q. Thank you.	
22 know, the first or second week of March.	22 Did Strategic Vision attempt to contact	
23 Q. Were you surprised by the letter?	23 Mr. Guo or Lianchao or Ms. Wang after receipt of	
24 A. I thought it was idiotic, yes.	24 this letter?	
25 Q. Why did you think it was idiotic?	25 A. Well, Yvette had been taken off the	
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1 A. Because we heard nothing from them. We	1 case. She was forbidden, apparently, to have	
2 were continuing to do the work. And it was	2 anything to do with it. So the only two people	
3 silly.	3 that would have been contactable would have been	
4 Q. What work was Strategic Vision doing	4 Lianchao and I'm sure that -- again, I'm not sure	
5 after January 30th that --	5 of the dates, but I'm sure -- and Lianchao	
6 A. All of February. Or up until the 23rd	6 travels, too, so I'm not sure where he was in	
7 of February, to be precise.	7 February, but I'm sure that both Mike and I must	
8 Q. And were there any meetings with	8 have had some conversation with him in February,	
9 Lianchao Han and Mr. Guo after January 30, 2018?	9 after this.	
10 A. Not with us, no.	10 Q. But you don't remember that, sitting	
11 Q. With whom, then?	11 here today, what that conversation was like?	
12 A. With Mike and myself, no. With	12 A. No. Well, I mean, we were very	
13 Lianchao and Guo, possibly. I don't know.	13 surprised and very unhappy, and we'd been working	
14 Q. Let me ask this then. Did you or	14 hard to -- to do what Guo wanted, so...	
15 Dr. Waller meet with Lianchao after January 30,	15 Q. And did Lianchao say anything back to	
16 2018 concerning this contract?	16 you, or what was discussed?	
17 A. That's a good question. I doubt it,	17 A. I think he said that, you know, Guo	
18 because I didn't know that there was any issue	18 gets upset all the time about a lot of things,	
19 other than, you know, we were doing our best and	19 and so maybe we -- he could smooth it over and	
20 pedaling fast.	20 calm him down and so forth. And then we just, I	
21 Q. So Strategic Vision didn't deliver any	21 think, hoped that that would happen, and it	
22 information to Lianchao, or certainly Yvette,	22 didn't. So then the -- this thing was done, so	
23 after January 30, 2018?	23 we just stopped.	
24 A. We could have. I'd have to ask Mike.	24 Q. You mean this lawsuit?	
25 Q. You didn't do it personally?	25 A. Yes.	

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<p style="text-align: right;">Page 246</p> <p>1 Q. When did you instruct Mike, or anyone  2 else involved with the Strategic Vision team, to  3 just stop work on this project?</p> <p>4 A. After the 23rd of February.</p> <p>5 Q. You don't remember the exact date?</p> <p>6 A. No. We had things in the hopper that  7 were being produced, but they -- we bought them,  8 so we had to pay for them, so when we got the  9 information, then we could produce it, but...</p> <p>10 Q. And did Dr. Waller fly to Europe to  11 tell the leader of Team 1 to stop work, or how  12 did that happen?</p> <p>13 A. I'm not sure. You would have to ask  14 him how he did that. He may have met with him  15 overseas.</p> <p>16 Q. Okay. In connection with splitting the  17 profits from this engagement with Dr. Waller, do  18 you owe him money, or does Strategic Vision owe  19 him money I should say?</p> <p>20 A. First of all, there weren't profits.</p> <p>21 Q. Earlier we discussed your arrangement  22 with Dr. Waller to split the proceeds of this  23 engagement, correct?</p> <p>24 A. That's correct.</p> <p>25 Q. And has that splitting occurred, is</p>	<p style="text-align: right;">Page 248</p> <p>1 stamped SVUS00040 and SVUS00041, marked  2 for identification.)</p> <p>3 Q. Just take a moment to take a look at  4 these two documents, SVUS40 and 41.</p> <p>5 A. Correct.</p> <p>6 Q. Do you recognize these documents?</p> <p>7 A. Yes, I do.</p> <p>8 Q. What are they?</p> <p>9 A. I think these were done by the -- I  10 can't remember if these were done by the ASOG  11 guys. I think they were done by the ASOG guys,  12 because of the socials. And they were -- Xi  13 Ping -- Xi Jinping, who is the premier of China,  14 and then his number 2, the next vice president of  15 the communist party in China.</p> <p>16 And this is a -- this is a -- sort of a  17 geo -- geologic -- I mean, how would I put it?  18 It's sort of a graph of the connections between  19 certain families that were in the original  20 document that we were investigating. So this was  21 like a -- not a flow chart; this was like a  22 genealogical -- I don't know what you want to  23 call it -- chart.</p> <p>24 Q. A family tree, is that what it is?</p> <p>25 A. It's sort of a family tree, yeah. But</p>
<p style="text-align: right;">Page 247</p> <p>1 what I should ask?</p> <p>2 A. Yes, because our time was valuable for  3 those two months, plus the people that we had  4 already contracted to pay for the research and so  5 forth. We expected to have a three-month  6 contract at the very least, which were the terms  7 of the agreement, so...</p> <p>8 Q. And what I'm asking is, did you at some  9 point send Dr. Waller a wire or write him a check  10 for his half of this engagement?</p> <p>11 A. I already answered yes.</p> <p>12 Q. And that was -- was that \$250,000 that  13 you referred to earlier?</p> <p>14 A. Yes. More or less. Plus expenses,  15 travel expenses and other expenses.</p> <p>16 Q. And there was another wire for about  17 \$300,000 for Team 1, right?</p> <p>18 A. Yes, at least.</p> <p>19 Q. Okay. So as far as you and Dr. Waller  20 are concerned, there's nothing left to split,  21 that's already been --</p> <p>22 A. Oh, that baby -- that train's long left  23 the station.</p> <p>24 MR. GRENDI: Let's go to 14.</p> <p>25 (Wallop Exhibit 14, Document Bates</p>	<p style="text-align: right;">Page 249</p> <p>1 it shows the relationships of many of these  2 people that were in our original document from  3 Guo.</p> <p>4 Q. Did you give this document to the  5 client?</p> <p>6 A. To the client?</p> <p>7 Q. Yeah, did you deliver this family tree?</p> <p>8 A. This is when we were told they were  9 RPs.</p> <p>10 Q. So you got this information on or about  11 February 15th?</p> <p>12 A. Yes. Again, I would have to -- yes.</p> <p>13 Q. But you didn't give it to Lianchao?</p> <p>14 A. We never gave it to him. We told  15 Lianchao.</p> <p>16 Q. What this family tree or --</p> <p>17 A. Yes.</p> <p>18 Q. -- chart includes?</p> <p>19 A. We told them that they were all RPs,  20 that the names that we had were RPs that we had  21 given in. And, again, Mike would remember how  22 many of these we gave.</p> <p>23 Q. And just turning to the second page --</p> <p>24 A. Okay.</p> <p>25 Q. -- SVUS41?</p>

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1	(Wallop Exhibit 16, Invoice from Allied	1	screamed and hollered, and that's why --
2	Special Operations Group, Bates stamped	2	A. Well, yeah, because normally we
3	SVUS000262, marked for identification.)	3	understand -- look, again, a little bit in the IC
4	MR. SCHMIDT: After this document, why	4	is that -- that, when you get into certain
5	don't we take a two-minute break?	5	records' protected arenas you cannot, you cannot
6	MR. GRENDI: Yeah, sure.	6	invade that space.
7	Q. So do you recognize this document, this	7	So while they were sniffing around the
8	invoice from Allied Special Operations Group?	8	edges of each one of these files, we said, you
9	A. Correct, ASOG.	9	know, between us, we can't touch it, so there
10	Q. And why was the invoice reduced from	10	should be no bill. So then that's when they sent
11	over \$100,000 to \$5,000?	11	the \$5,000 bill.
12	A. Because they couldn't touch the -- they	12	Q. Because they had spent some time trying
13	couldn't go into the files that they had -- that	13	to do this?
14	they had with the names; they could have gone to	14	A. They'd spent a week. And the time --
15	prison, all right? So they refunded us -- or	15	the timing thing is there, the time -- whatever
16	refunded is the wrong word. I wish they had	16	it is. Our rate, hours worked. And those are
17	refunded, but, no, they sent us a bill -- in	17	the initials of the people that worked there.
18	other words, so that you can see what this sort	18	MR. GRENDI: We can take that break
19	of thing actually cost, this is what these things	19	now, if you like.
20	cost, and this was only for a few names, and this	20	THE VIDEOGRAPHER: Off the record at
21	is only for one week. So they -- you know, we	21	4:41.
22	bit and screamed and hollered, and so they ended	22	(Whereupon, a short recess was taken.)
23	up sending us the -- the bill for the 5,000.	23	THE VIDEOGRAPHER: Back on the record
24	5,412.50.	24	at 4:48.
25	Q. So, originally, ASOG was trying to get	25	MR. GRENDI: Let's do Exhibit 17 here.
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1	\$105,000 from --	1	This will be Wallop 17.
2	A. It was 111,000.	2	(Wallop Exhibit 17, Document Bates
3	Q. Oh, I'm sorry. Did I miss -- I thought	3	stamped SVUS000272 to SVUS000277, marked for
4	I -- no, that's fair. Yeah, 111.	4	identification.)
5	A. \$111,700. That's what these people	5	Q. Do you recognize this document,
6	charge. Not these people, but the industry	6	Ms. Wallop?
7	charges.	7	A. I do.
8	Q. And Strategic Vision kind of fought	8	Q. What is this?
9	back on that and said, well, you didn't really do	9	A. This was an investigation background on
10	the work, so?	10	a couple of people that are on the list.
11	A. No, we did not do that.	11	Q. Are they one of the 15 fish or are they
12	Q. How did you negotiate with them over	12	tertiary or --
13	the total amount owed?	13	A. That's a good question. I honestly
14	A. We explained to -- I mean, they	14	can't remember. But they were of great interest
15	explained to us that they would have gone ahead	15	to -- I think they were part of the 15 fish.
16	and done it and billed us for the 111,000,	16	They were a great interest to Guo.
17	without question. Until they bumped into the	17	Q. And just going back to ASOG. Has
18	RPs. When they bumped into the RPs, they said,	18	Strategic Vision ever worked with ASOG before?
19	we can't do it. You know, as American citizens,	19	A. I haven't, but I've worked on the IC
20	neither can you. So we didn't.	20	with a couple of people that have been involved
21	Q. And because of that, they -- ASOG	21	with ASOG.
22	determined that they should reduce the invoice to	22	Q. And IC, does that mean intelligence
23	just \$5,000?	23	community?
24	A. They did.	24	A. Yes.
25	Q. I'm just confused, because you said you	25	Q. And how did you work with members of

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<p style="text-align: right;">Page 278</p> <p>1 activities recruiting, vetting, engaging and  2 marshaling the initial efforts of the various  3 investigators and analysts in The United States,  4 Europe and the Middle East." Do you see that?</p> <p>5 A. I do.</p> <p>6 Q. Did Eastern ever engage any analysts in  7 the Middle East?</p> <p>8 A. Eastern?</p> <p>9 Q. Oh, I'm sorry, Strategic Vision. Did  10 Strategic Vision ever engage any analysts in the  11 Middle East?</p> <p>12 A. It could have, and I wouldn't know. It  13 could have been done through Team 1.</p> <p>14 Q. Wasn't Team 1 located in Europe?</p> <p>15 A. They were, but they could have -- they  16 all have links.</p> <p>17 Q. Okay. Let me ask you this then. So is  18 it your understanding that Team 1 could farm out  19 its responsibilities to other teams to help it  20 get information?</p> <p>21 A. It was all part of the team.</p> <p>22 Q. Right. What I'm asking is, did Team 1  23 have subteams?</p> <p>24 A. No. They would have had teams that --  25 well, if you call them subteams, they weren't.</p>	<p style="text-align: right;">Page 280</p> <p>1 Q. And what vetting was done to select  2 the -- well, what vetting was done to select Team  3 1?</p> <p>4 A. Experience.</p> <p>5 Q. So just Dr. Waller's experience with  6 Team 1?</p> <p>7 A. Yes.</p> <p>8 Q. Let's look at paragraph 62. Paragraph  9 62 says that, "Mr. Guo provided to Strategic  10 Vision a list of 92 potential subjects with no  11 prioritization." Do you see that in the middle  12 of the paragraph there?</p> <p>13 A. I do.</p> <p>14 Q. And what list was that that had just 92  15 non-prioritized names?</p> <p>16 A. Exhibit 7.</p> <p>17 Q. So you didn't understand that there was  18 any priority to the 15 names that are in very  19 large font with numbers next to them?</p> <p>20 MR. SCHMIDT: Objection. Go ahead.</p> <p>21 A. No, I would not -- I would not agree  22 with that. We numbered them as to priority.</p> <p>23 Q. Well, you received the document with  24 the numbers next to -- let's just say, if you  25 look at the first page?</p>
<p style="text-align: right;">Page 279</p> <p>1 They were part of the original team. And if they  2 used people in the Middle East or Europe or  3 wherever -- you know, the dark web has no  4 geographical location, so it could have been  5 anywhere that they were -- they were challenging  6 each other to find what they needed to find.  7 That's how it works.</p> <p>8 Q. But you understood Team 1 was located  9 in Europe, correct?</p> <p>10 A. Yes.</p> <p>11 Q. And Team 2 wasn't -- well, Team 2 was  12 ASOG, correct?</p> <p>13 A. Correct.</p> <p>14 Q. And Team 2 is located in The United  15 States?</p> <p>16 A. Correct.</p> <p>17 Q. And ASOG wasn't contacted until what  18 time?</p> <p>19 A. I answered that before.</p> <p>20 Q. Was that about February, middle --</p> <p>21 A. The beginning of February, and then  22 beginning to the 5th -- I don't know, 5th of  23 February. I have to go back and look.</p> <p>24 Q. And what was the recruiting process?</p> <p>25 A. Mike and I were using our channels.</p>	<p style="text-align: right;">Page 281</p> <p>1 A. Yes.</p> <p>2 Q. It says Anita Suen --</p> <p>3 A. Yeah.</p> <p>4 Q. -- and it has a big 1 next to it?</p> <p>5 A. Yes.</p> <p>6 Q. It also has the types of reports, does  7 it not?</p> <p>8 A. Correct.</p> <p>9 Q. Did you not understand that that meant  10 that Anita Suen would be one of the fish?</p> <p>11 A. She was the first fish.</p> <p>12 Q. Right.</p> <p>13 A. She was the most important fish for  14 him.</p> <p>15 Q. Right.</p> <p>16 A. So the first, more or less, 15 in here  17 were the first -- were the first 15 fish that he  18 was talking about.</p> <p>19 Q. And there happens to be exactly 15  20 names with a number next to it and the number of  21 reports that were requested, and the types of  22 reports?</p> <p>23 A. Pretty much, yes. You'd have to count  24 the names of the fish, yeah. If you can see --  25 so you can't go by the page number, in other</p>

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<p style="text-align: right;">Page 282</p> <p>1 words. You have to go by the subject. See,    2 like, here is the second fish (indicating).</p> <p>3 Q. Right.</p> <p>4 A. So the second fish is on page 11.</p> <p>5 Q. Right.</p> <p>6 A. Okay. So you -- you'd have to go -- so    7 these 15 fish are in here at least -- at least 15    8 fish in here.</p> <p>9 Q. And you understood that those were    10 the -- or Strategic Vision understood that those    11 were the 15 fish that the research was supposed    12 to start on, correct?</p> <p>13 A. Yes.</p> <p>14 MR. SCHMIDT: Objection.</p> <p>15 Q. Do you still have the virgin laptop    16 that's described in paragraph 63?</p> <p>17 A. Yes.</p> <p>18 Q. And do you just have a ton of these    19 virgin laptops lying around, because of your --    20 Strategic Vision's work?</p> <p>21 A. On this specific issue, we had two    22 domestic ones, ones here, and then a battery of    23 ones overseas.</p> <p>24 Q. Could Strategic Vision get those    25 laptops if they request -- it requested them from</p>	<p style="text-align: right;">Page 284</p> <p>1 Q. Who did you understand was doing that    2 surveillance, you mean the building security or    3 the --</p> <p>4 A. Oh, any number of people could easily    5 do the -- the security. Mike's face is very    6 recognizable, people who knew who Mike was;    7 anybody in the Chinese communist party would have    8 made us, so...</p> <p>9 Q. I see. But Strategic Vision did meet    10 with Mr. Guo repeatedly after the contract was    11 signed?</p> <p>12 A. We tried not to.</p> <p>13 MR. SCHMIDT: Objection.</p> <p>14 THE WITNESS: Oh, sorry.</p> <p>15 MR. SCHMIDT: It's okay.</p> <p>16 A. We tried not to. We explained to him    17 after about maybe the fourth time that we just    18 couldn't do that anymore, it was just really    19 dangerous for him and dangerous for us.</p> <p>20 Q. Just so we're clear. The last time you    21 personally met with Mr. Guo was -- was that    22 January 30th?</p> <p>23 A. That was the 26th. No, it was the 26th    24 of January, because the 30th was when Mike met    25 with Yvette at Union Station.</p>
<p style="text-align: right;">Page 283</p> <p>1 Team 1?</p> <p>2 A. Never. They've been destroyed. They    3 were destroyed on purpose, because we would    4 destroy them every week so that there was no    5 tracing to the IP number.</p> <p>6 Q. So it's Strategic Vision's practice to    7 regularly destroy these laptops for security    8 purposes?</p> <p>9 A. Those particular ones, yes. We did not    10 destroy the two that we had.</p> <p>11 Q. Paragraph 66, it says, "at the time the    12 agreement was negotiated with Mr. Guo, Strategic    13 Vision and Mr. Guo expressly agreed that they    14 would not meet in person again." Do you see    15 that?</p> <p>16 A. Yes.</p> <p>17 Q. Was that maintained or followed?</p> <p>18 A. He kept insisting on wanting to meet    19 us, and we kept trying to explain to him that    20 every time we went in and out, we were being    21 photographed. We didn't like that. We did not    22 want to be identified with his programs.</p> <p>23 Q. And, by photographed, do you mean going    24 in and out of his apartment building?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 285</p> <p>1 Q. Got it.</p> <p>2 A. Or Penn Station.</p> <p>3 Q. When did Mr. Guo summon you to his    4 yacht in Florida?</p> <p>5 A. That must have been sometime -- it    6 might have been at the 26th meeting, January 26,    7 2017 -- 2018.</p> <p>8 Q. But I take it that yacht meeting never    9 happened?</p> <p>10 A. No. We refused to go. It was not    11 safe.</p> <p>12 Q. Let's go to paragraph 68. It says    13 "Strategic Vision learned that most of the    14 individuals so identified by Eastern have been    15 designated by the U.S. Department of State under    16 the Obama administration as records protected    17 persons, meaning that information concerning    18 their status and activities was not subject to    19 disclosure under any circumstance." Do you see    20 that?</p> <p>21 A. That's correct.</p> <p>22 Q. And did that in any way hinder Team    23 One's efforts, the records protected persons    24 designation?</p> <p>25 A. Actually, the curious thing is here, we</p>

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<p style="text-align: right;">Page 286</p> <p>1 did not alert Eastern, we alerted Guo and we    2 alerted Lianchao, and -- and I believe that    3 Yvette was alerted -- no, I don't think -- Yvette    4 may not have been alerted because that was -- by    5 that time, it was in February.</p> <p>6 Q. It says most of the individuals. Is    7 that most of the fish?</p> <p>8 A. Yes.</p> <p>9 Q. Is it fair to say that ASOG only looked    10 into five individuals on the list?</p> <p>11 A. I don't know how many they looked into.    12 Again, you would have to ask Mike. They could    13 have looked into all of them. I honestly don't    14 remember.</p> <p>15 Q. Let's look at paragraph 70.</p> <p>16 A. 70?</p> <p>17 Q. 7-0, yeah.</p> <p>18 A. Okay.</p> <p>19 Q. It says, "Strategic Vision verbally    20 reported to Mr. Guo and Eastern that Strategic    21 Vision could not within the limits of U.S. law    22 obtain the information sought by Eastern on its    23 initial list of subjects and that Strategic    24 Vision's work would be refocused upon others on    25 Eastern's list."</p>	<p style="text-align: right;">Page 288</p> <p>1 you'll be in bigger trouble than we will.    2 They'll send you back to China.</p> <p>3 Q. Going to paragraph 71. It says:    4 "In the face of Eastern's insistence,    5 however, Strategic Vision hand-delivered its raw    6 data to Mr. Guo and Eastern on January 26, 2018,    7 with the caveat that it would be of no use to    8 Eastern until Strategic Vision had an opportunity    9 to analyze it and produce a formal report"?</p> <p>10 A. Yes, that's correct. And formal report    11 would have meant, not just sort of a -- a file    12 that had been encrypted, but it also needed to    13 have Chinese translation, as I understood it, and    14 also needed to have -- and also needed -- there    15 are certain lines of code.</p> <p>16 Look, I'm not a code expert, but there    17 are lines of code that people have to go through    18 and actually sort of translate into a language,    19 and he kept -- and it takes time to actually    20 translate that code. You can't just stick it    21 into a machine and expect it to happen.</p> <p>22 So we gave him the raw code, I believe,    23 on both the 26th and the 31st, or the 31st of    24 January, those two different USB keys.</p> <p>25 Q. Then it says, "until Strategic Vision</p>
<p style="text-align: right;">Page 287</p> <p>1 Do you remember when you told    2 Mr. Guo --</p> <p>3 A. That must have --</p> <p>4 Q. -- this information?</p> <p>5 A. That must have been through Lianchao.    6 And you keep using the word Eastern. It would    7 have been --</p> <p>8 Q. I was just reading the complaint.</p> <p>9 A. Yeah, but it's -- it's not Eastern.</p> <p>10 It's Guo. And I think it would have been -- that    11 would have been at the -- that would have been at    12 the -- at the January 26th lunch.</p> <p>13 Q. It says, "As a result, Mr. Guo became    14 enraged"?</p> <p>15 A. Yes. He was -- I thought he was going    16 to jump on the table.</p> <p>17 Q. "And irrationally insisted that    18 Strategic Vision immediately deliver its work    19 product"?</p> <p>20 A. That's correct. And continue to dive    21 into illegal areas. And we said, we can't do    22 that. That's when Mike apologized and said,    23 we're really sorry, but, you know, there are    24 certain things we can do, and we'll get, but    25 there are other things we can't do, and we --</p>	<p style="text-align: right;">Page 289</p> <p>1 had an opportunity to analyze it and produce a    2 formal report." How would that work?</p> <p>3 A. Well, we needed to be able to take that    4 USB key back to the Team 1 to have them go    5 through and -- and configure however it was    6 supposed to be done. And that was not -- that    7 was not my area, that was Mike's area, and Mike    8 can explain that really succinctly to you.</p> <p>9 Q. Paragraph 74. There's a reference to a    10 wire reversal?</p> <p>11 A. Yes.</p> <p>12 Q. How did that attempted wire reversal    13 come to your attention?</p> <p>14 A. That was wild. I got a call, like,    15 about the -- I have to see, I think it was around    16 the 12th or the 16th or something like that of    17 January 2018, and -- from Citibank wire    18 department saying that there'd been a request to    19 have 499,000 and some change reversed back to the    20 sender. And I said, well, what are you talking    21 about? She said, well, we've gotten a request.    22 So then I called one of my private    23 bankers at Citibank and I said, can this be done?    24 I've never heard of such a thing. He said,    25 absolutely not, it can never be done. Once the</p>

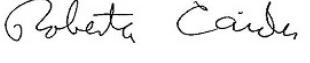
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<p style="text-align: right;">Page 298</p> <p>1 in for the protection of the parties, is that a  2 fair statement?</p> <p>3 A. That's a fair statement.</p> <p>4 Q. And you, being Strategic, took some  5 steps to maintain the identity of the parties, to  6 keep the identity of the parties secret, is that  7 fair?</p> <p>8 A. That's correct.</p> <p>9 Q. And is it -- is it one of Strategic's  10 business goals to protect the identities of its  11 clients, generally speaking?</p> <p>12 A. Yes, because it's generally a private  13 agreement or an arrangement between my clients  14 and myself.</p> <p>15 Q. And was this agreement different in  16 that regard in any way from your other clients;  17 was there a heightened degree of security or a  18 sense of keeping things -- keeping the names of  19 the parties confidential?</p> <p>20 A. Absolutely --</p> <p>21 MR. SCHMIDT: Objection. But go ahead.</p> <p>22 THE WITNESS: Sorry.</p> <p>23 MR. SCHMIDT: No, that's fine.</p> <p>24 A. Absolutely.</p> <p>25 Q. When you learned that Eastern would be</p>	<p style="text-align: right;">Page 300</p> <p>1 A. He represented -- Guo represented that  2 he was, in fact, the person that was going to  3 fund this. So I presumed, when Yvette's sitting  4 next to me and having conversations with him,  5 along with -- along with all of the conversations  6 that we'd had in his apartment, that obviously  7 it's Guo with whom we are dealing. So Guo equals  8 Eastern, one would presume. Just saying.</p> <p>9 Q. Did you do any independent research to  10 determine whether or not that was -- that Guo  11 equaled Eastern?</p> <p>12 A. It's -- it's so redundant, but, no, we  13 didn't, because he said he was going to fund it,  14 whatever it was, and we did not know the name of  15 the entity that he was going to use.</p> <p>16 Q. When did he first tell you that it  17 would be an entity and not himself personally  18 that would be the counterparty to the contract?</p> <p>19 A. Because he said that he had accounts  20 everywhere and that it would probably be through  21 the U.K. office of William Wu or William Yu, or  22 whatever his name was, that was the -- his  23 financial person.</p> <p>24 Q. And when did you find that out; when  25 was the first time?</p>
<p style="text-align: right;">Page 299</p> <p>1 signing the contract on January 6th, the date  2 that you and Yvette executed the contract, did  3 you speak to Mr. Guo at any point thereafter,  4 prior to signing the contract but after learning  5 that Eastern would be the signatory?</p> <p>6 A. Gosh, I -- well, let me see. So she  7 signed it on the -- the 6th of January. Then we  8 saw him subsequently during January. So I never  9 had any direct contact with him, it was only  10 through Yvette or Lianchao. So I'm not sure if  11 that answers your question.</p> <p>12 Q. After finding out that Eastern would be  13 the counterparty to the contract --</p> <p>14 A. Right.</p> <p>15 Q. -- that's the subject of this  16 litigation, did you talk to Mr. Guo about also  17 signing the contract?</p> <p>18 A. He represented Eastern, and in all of  19 our conversations he was the only party with whom  20 I negotiated, and Mike negotiated the discussion  21 and the contract.</p> <p>22 Q. So after finding out that Eastern, not  23 Mr. Guo, would be the counterparty to the  24 contract, did you talk to Mr. Guo about also  25 signing the contract?</p>	<p style="text-align: right;">Page 301</p> <p>1 A. When did I find it out? I mean, we  2 were discussing the payment process and how that  3 would work after looking at the -- we had the  4 vision paper, we had the -- the Word  5 presentation, we had done another sort of vision  6 paper; all of these were in different discussions  7 with him moving forward.</p> <p>8 He then said, when we got to sort of  9 the third or fourth discussion of all of this,  10 that he wanted to fund it, and he explained that  11 he paid \$250 million for that, and that he wanted  12 very much to make sure that, if this was done,  13 that we would have a long-term contract for at  14 least three years, and for possibly up to 4,000,  15 quote, fish, and he said that he would fund it,  16 so we presumed he would fund it. We didn't know  17 whether he was Eastern or, as I say, the Mickey  18 Mouse Club. We didn't know. He never told us  19 who it was going to be.</p> <p>20 Q. But prior to signing the contract --</p> <p>21 A. Right.</p> <p>22 Q. -- you never asked Mr. Guo to sign it  23 himself?</p> <p>24 A. No, because he wouldn't.</p> <p>25 Q. Did you ever ask him?</p>

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1 understanding at that time that Yvette was on the 2 telephone with Mr. Guo. 3 Did you ask Yvette to ask Mr. Guo if he 4 would personally sign the contract? 5 A. No. 6 Q. And how long was that meeting at which 7 you found out that Eastern would be signing, and 8 you and Yvette signed the contract? 9 A. I have no idea. It was during that 10 moment when she had the paperwork and we made the 11 changes, we agreed to the changes, she signed, 12 and then I signed, and it had Eastern on the top. 13 That's all I know. 14 Q. All in all, two hours? 15 A. Maybe. Let's call it two hours, to 16 make you happy. 17 Q. No, not -- I want the truth. No answer 18 is going to make me happy. 19 A. Two hours is fine with me. 20 Q. I just want the truth. 21 A. Two hours is fine. 22 Q. Two hours? 23 A. Sure. 24 Q. And your understanding is that this 25 contract was the culmination of the conversations	1 D E C L A R A T I O N 2 3 I hereby certify that having been first 4 duly sworn to testify to the truth, I gave the 5 above testimony. 6 7 I FURTHER CERTIFY that the foregoing 8 transcript is a true and correct transcript of 9 the testimony given by me at the time and place 10 specified hereinbefore. 11 12 13
	FRENCH WALLOP
	18 Subscribed and sworn to before me 19 20 this ____ day of _____ 20___. 21 22 23
	NOTARY PUBLIC
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1 that you had had with Mr. Guo about the 2 investigative services that Strategic was going 3 to provide? 4 A. He hired us, not Yvette. 5 Q. So this contract was the culmination of 6 those conversations? 7 A. Yes. 8 MS. TESKE: Okay. I have nothing 9 further. 10 MR. SCHMIDT: I have no questions. 11 Thank you. 12 THE WITNESS: Cheers. 13 MR. SCHMIDT: Let him go off the 14 record. 15 THE VIDEOGRAPHER: This concludes 16 today's deposition. The time is 5:57. 17 18 (Whereupon, the within proceedings 19 concluded at 5:57 p.m., on the 20 12th day of February, 2019.) 21 22 * * * * * 23 24 25	1 ERRATA SHEET 2 3 NAME OF CASE: EASTERN PROFIT v STRATEGIC 4 DATE OF DEPOSITION: Tuesday, February 12, 2019 5 NAME OF WITNESS: FRENCH WALLOP 6 PAGE LINE FROM TO 7 8 ____ _____ _____ _____ _____ _____  9 ____ _____ _____ _____ _____ _____  10 ____ _____ _____ _____ _____ _____  11 ____ _____ _____ _____ _____ _____  12 ____ _____ _____ _____ _____ _____  13 ____ _____ _____ _____ _____ _____  14 ____ _____ _____ _____ _____ _____  15 ____ _____ _____ _____ _____ _____  16 ____ _____ _____ _____ _____ _____  17 ____ _____ _____ _____ _____ _____  18 ____ _____ _____ _____ _____ _____  19 ____ _____ _____ _____ _____ _____  20 ____ _____ _____ _____ _____ _____  21 ____ _____ _____ _____ _____ _____  22 ____ _____ _____ _____ _____ _____  23 ____ _____ _____ _____ _____ _____  24 25

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<p>1 REPORTER'S CERTIFICATE 2 3 STATE OF NEW YORK ) 4 ) ss. 5 COUNTY OF NEW YORK ) 6 7 I, ROBERTA CAIOLA, a Shorthand Reporter 8 and Notary Public within and for the State of New 9 York, do hereby certify: 10 That FRENCH WALLOP, the witness whose 11 deposition is hereinbefore set forth, was duly 12 sworn by me and that such deposition is a true 13 record of the testimony given by such witness. 14 I further certify that I am not related 15 to any of the parties to this action by blood or 16 marriage and that I am in no way interested in 17 the outcome of this matter. 18 In witness whereof, I have hereunto set 19 my hand on this date, February 21, 2019. 20 21  22 23 ROBERTA CAIOLA 24 25</p>	Page 310